



Strategic Environmental Assessment for the Lee Neighbourhood Plan

Environmental Report to accompany the submission version of the Lee Neighbourhood Plan

Lee Forum

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Quality information

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Front cover: Bridge over the River Quaggy, available to access on the [Hither Green Community Association](#) website.

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Non-Technical Summary

What is Strategic Environmental Assessment?

A strategic environmental assessment (SEA) has been undertaken to inform the Lee Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Lee Neighbourhood Plan?

The Lee Neighbourhood Plan (hereafter referred to as the “LNP”) has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the LNP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (September 2021), which includes information about the LNP area’s environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the LNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the LNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the LNP has been assessed.
- The appraisal of alternative approaches for the LNP.
- The likely significant effects of the LNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the LNP; and
- The next steps for the LNP and accompanying SEA process.

Assessment of reasonable alternatives for the Lee Neighbourhood Plan

Housing numbers to be delivered through the LNP

There is an identified housing need in the LNP area, although The Forum has not been provided with a specific housing target from Lewisham Council or the Royal Borough of Greenwich. The LNP is supportive in principle of the larger site allocations which are being considered through the emerging New Lewisham Local Plan (2020-2040). Several potential locations for site allocations have also been identified through the neighbourhood planning process to date, including through a site options assessment process.

Initial shortlisting of sites

Lee Forum (with support from an independent planning consultancy) has undertaken initial assessments of the various sites in the LNP area in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation. A total of 27 sites were considered through the assessment process. Further details can be found in the Site Assessment Report accompanying the submission version of the LNP.

Following the results of the site assessment process, a total of twelve sites were selected as allocations for mixed-use development within the LNP. This includes eight small brownfield sites within the existing built-up area (all between 0.01 and 0.09 ha), along with four sites which are currently being considered within the emerging New Lewisham Local Plan.

The allocations, which are listed below in **Table NTS1**, are located within Lewisham, and are shown in **Figure NTS1** below.

Table NTS1: Allocated sites within the LNP

SEA ID	Name of site, address ¹	Size (Ha) ²
Site 1	Land off Dacre Park, Adjacent to Allotments	0.09
Site 2	Land on Old Road	0.02
Site 3	Old Road Depot	0.08
Site 4	Garage Site on Burnt Ash Hill*	0.54
Site 5	Site of Disused Garages on Wisteria Road	0.02
Site 6	Effingham Road	0.10
Site 7	Sainsbury's Site*	1.04
Site 8	Site at 321-341 Lee High Road, SE12 8RU*	0.21
Site 9	Disused Lockup Garages off Burnt Ash Road	0.02
Site 10	Leegate Shopping Centre*	1.46
Site 11	Corner of Millbank Way and Osberton Road	0.02
Site 12	Vehicle Hire Corner of Lee High Road and Manor Park	0.09

¹ Sites with an asterisk are those which are proposed allocations through the emerging New Lewisham Local Plan, some of which have previously been granted planning permission which has since elapsed.

² Represents total site size and not necessarily total developable area and is taken from the LNP.

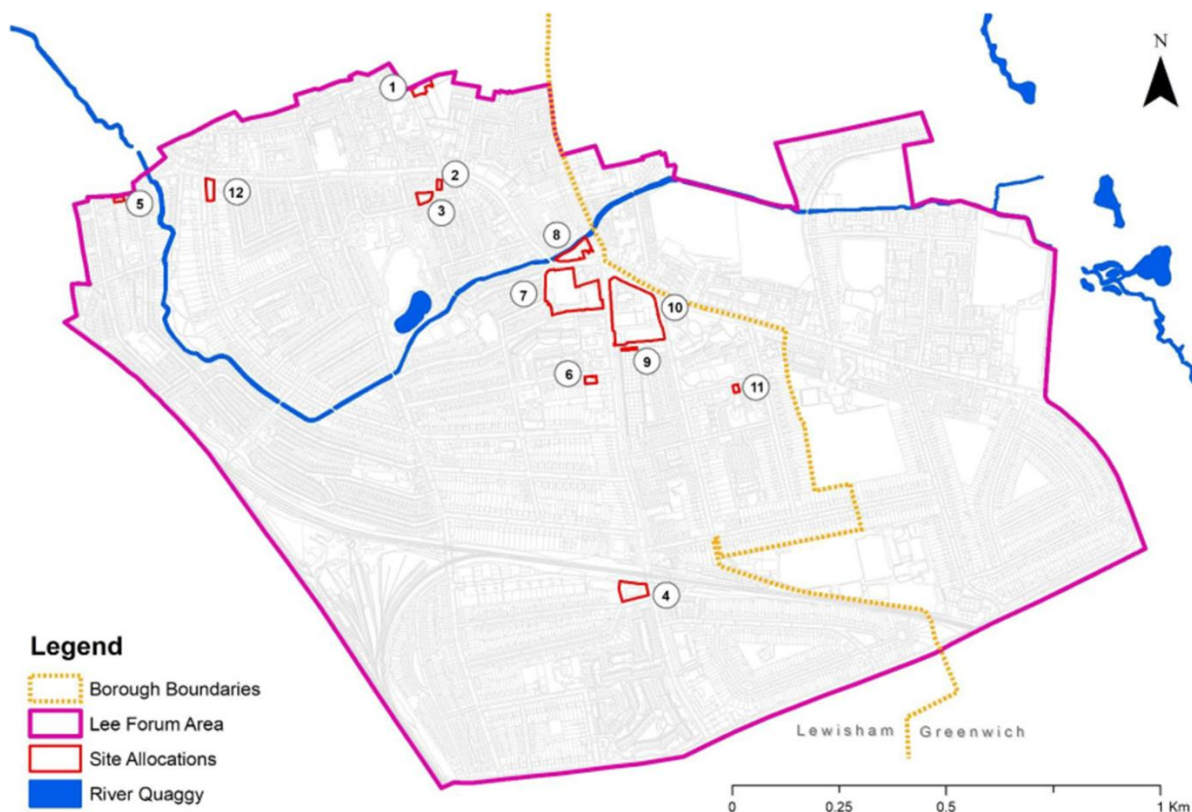


Figure NTS1: Location of the allocated sites within the LNP

Options considered through the SEA process

The sites currently being taken forward by the Forum as Neighbourhood Plan allocations are either those which have been allocated through the emerging New Lewisham Local Plan (2020-2040) or comprise smaller brownfield sites.

These sites mirror the proposals set out in the Local Plan and reflect in planning policy terms both the provisions of the Local Plan and the London Plan. For this reason, the SEA process has not considered site options as reasonable alternatives. This is given the allocations taken forward through the LNP are in general conformity with the provisions of the Local Plan and the policies of its umbrella spatial development strategy (the London Plan).

The SEA process has instead considered options for another key element of the LNP, the Leegate Centre.

Located within a prominent position in Lee District Town Centre, the Leegate Centre is the largest site in the LNP area and currently comprises Leegate Shopping Centre (constructed in the 1960s), two office blocks (Leegate House and Cantilever House), a multi-level car park, a community centre and housing. As stated within the emerging New Lewisham Local Plan (2020-2040), the site has an indicative development capacity of 450 residential units together with 805m² of employment floorspace and 5,449m² of main town centre use floorspace. It is recognised as being key to the renewal and revitalisation of the town centre environment and will play a critical role in linking sites and neighbourhoods surrounding it.

The Leegate Centre was not initially identified as an appropriate site allocation for consideration through the LNP, as it had existing planning permission during the

completion of the site assessment process. This planning permission has elapsed, and the site has since been bought by Galliard Homes (the site promoter).

There is a high demand for housing and employment space within Lewisham Borough. To meet these needs, Lewisham Council have been considering options relating to how it intends to plan for high densities and taller buildings, including through relevant evidence studies such as the Lewisham Characterisation Study (2019), Residential Density Technical Paper (2020), and the Tall Buildings Study (2021). These documents are available to access on the [Design and Character](#) evidence page for the emerging New Lewisham Local Plan.

Recent planning applications and discussions between Lewisham Council and Historic England has placed an impetus on evaluating the potential impact of tall buildings on the setting of the historic environment. The emerging New Lewisham Local Plan (Regulation 18 version as considered by Lewisham Council in November 2021) and the Mayor of London's London Plan (2021) also sets clear conditions for the development of taller buildings within district centre environments (as summarised within **Chapter 4** in the main body of the Environmental Report).

Existing proposals for the Leegate Centre which have been put forward by the site promoter proposes a building height of up to 15 storeys (with a view to unlocking and delivering a higher proportion of social and affordable housing). However, in light of the evidence presented above in relation to the development of tall buildings in the Borough, the Forum were keen to explore an alternative option which considers a building height of up to eleven storeys. This more limited building height would not exceed the height of the existing buildings within Lee District Town Centre.

On this basis, two options have been considered through the SEA process to explore the relative sustainability merits of these two approaches. These are as follows:

- Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.
- Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Appraisal findings

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through the seven SEA Themes and considers the relative sustainability merits of each of the options. Findings are presented as a commentary on effects, specifically within **Tables 4.2 to 4.8** within the main body of the Environmental Report.

Following the consideration of the local planning context, wider evidence studies, and the findings of the SEA, the Forum's preferred approach is for the Leegate Centre is to include lower building heights of up to eleven storeys (Option B).

Assessment of the submission version of the Lee Neighbourhood Plan

The submission version of the LNP presents 35 planning policies for guiding development in the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering. Earlier draft versions of the policies have been revisited and updated in light of the responses which were

received at Regulation 14 consultation, and through recommendations and suggestions proposed the SEA process to date.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the submission version of the LNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the submission version of the LNP. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Air Quality.
- Biodiversity and Geodiversity
- Climate Change
- Landscape and Townscape
- Historic Environment.
- Community Wellbeing; and
- Transportation.

The assessment has concluded that the submission version of the LNP is likely to have significant positive effects in relation to the 'Community Wellbeing' SEA Theme through delivering suitable and appropriate housing for the local community (via a range of types and tenures), improving accessibility to services, facilities and amenities, supporting the viability of Lee District Town Centre, facilitating improvements to the public realm (including through green and blue infrastructure enhancements), and encouraging healthier and active lifestyles. This will support social inclusion, the quality of life of residents, and community vitality.

The LNP will also bring positive effects in relation to the Landscape and Townscape SEA Theme. These benefits largely relate to the LNP's emphasis on protecting and enhancing landscape and townscape character, delivering high-quality design which respects and enhances local distinctiveness and sense of place, protecting important townscape features, and facilitating improvements to quality of the public realm.

In relation to the Historic Environment SEA Theme, the LNP includes several measures which seek to conserve and enhance both designated and non-designated heritage assets (and their settings). This includes through encouraging high-quality design which is informed by proportionate heritage assessments, increasing awareness, understanding and appreciation of the historic environment, and encouraging additional designations (including four proposed conservation area designations and locally important buildings) to appropriately safeguard and protect the historic environment. Given the Design Guide accompanying the LNP also sets out a comprehensive range of provisions relating to the historic environment, this will help provide an appropriate basis for the conservation and enhancement of the heritage assets and features surrounding the proposed site allocations.

Additionally, the LNP will bring positive effects in relation to the Biodiversity and Geodiversity SEA Theme by supporting net gains for biodiversity within new development proposals, enhancing ecological networks through green and blue infrastructure enhancements (including through the designation of nature improvement areas at Hither Green and the River Quaggy), and improving ecological resilience. Nonetheless, **the SEA recommends** that developers also consider

utilising the Government's latest available biodiversity metric tools (e.g. at the current time, the latest version is v3.0, which was published by Natural England and Defra in July 2021). This includes a specific metric for smaller development sites (which is likely to be appropriate for the eight smaller brownfield sites proposed through the LNP) and an 'environmental benefits from nature tool' which aims to maximise the benefits from delivering net gains.

Regarding the Climate Change SEA Theme, the LNP will potentially lead to positive effects through supporting proposals which deliver energy efficient designs and layouts, proactively respond to the potential impacts of climate change (i.e. the urban heat island effect, and flood risk concerns from increased storms / rainfall events), and by encouraging active and sustainable travel within the LNP area. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.

The LNP will also initiate several beneficial approaches regarding the 'Air Quality' and 'Transportation' SEA Themes, given its focus on enhancing the active travel network (including public rights of way and cycle routes), supporting healthy streets and low-traffic neighbourhoods, and encouraging a greater use of sustainable modes of transportation in the medium-to-long-term in order to positively contribute to the London Plan's 'Vision Zero' approach.

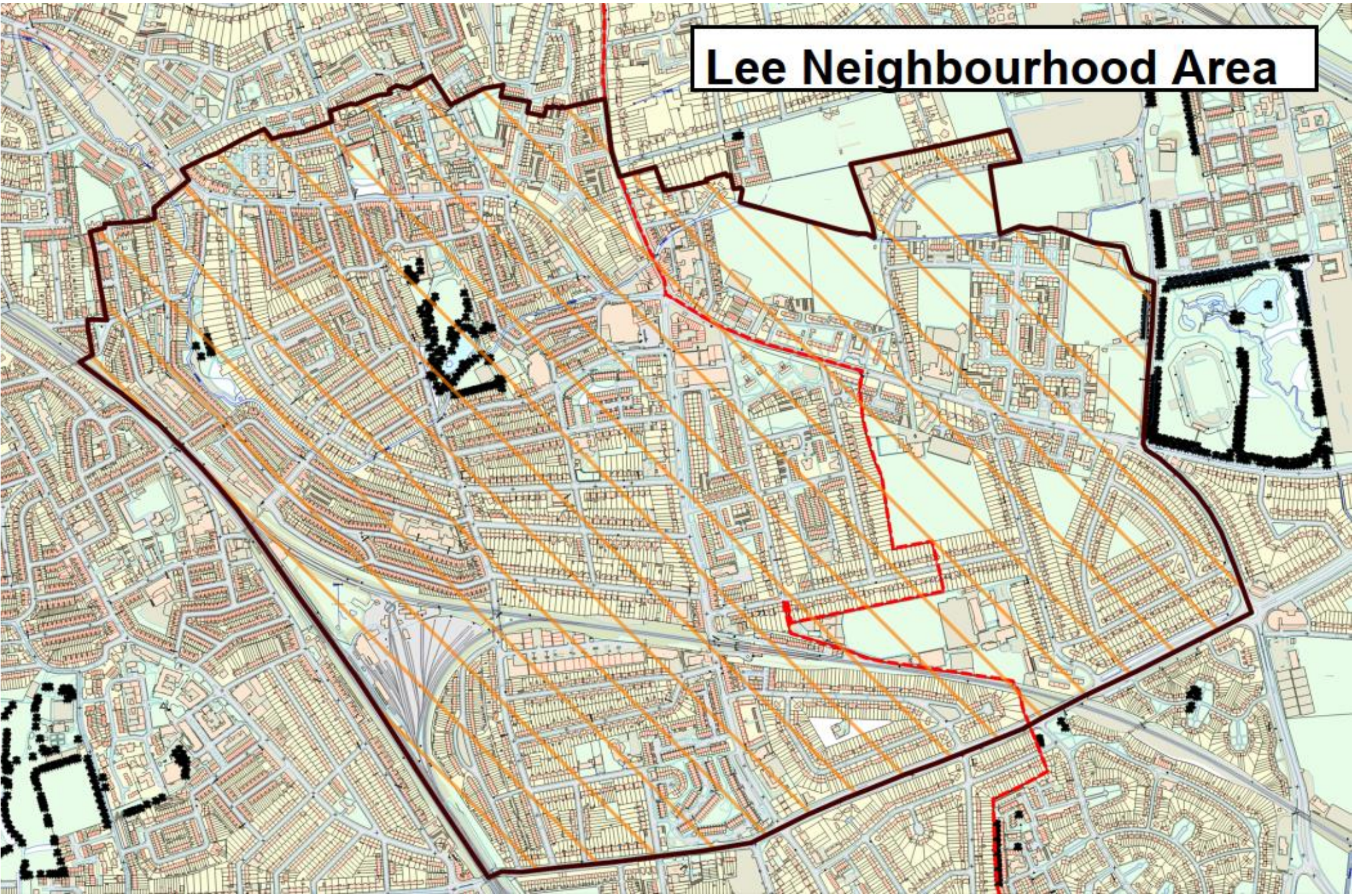
Next steps

The SEA Environmental Report accompanies the submission version of the LNP to the responsible authority, Lewisham Council, for Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the LNP will be subject to a referendum, organised by Lewisham Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the LNP will become part of the development plan for the LNP area.

Lee Neighbourhood Area



1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Lee’s emerging Neighbourhood Plan.
- 1.2 The Lee Neighbourhood Plan (hereafter referred to as “the LNP”) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The LNP is being prepared in the context of the adopted Lewisham Local Plan (2011-2026), the key documents of which include the Core Strategy and the Site Allocations Local Plan. Due regard is also given to the emerging Local Plan, “the New Lewisham Local Plan (2020-2040)”, with Regulation 18 consultation completed between January and April 2021. Due regard is also given to the Royal Greenwich Local Plan (2013-2028), the key document of which is the ‘Core Strategy with Detailed Policies’ document (adopted in July 2014).
- 1.3 It is currently anticipated that the LNP will be submitted to Lewisham Council later in 2021 for independent examination. Key information relating to the LNP is presented in **Table 1.1**.

Table 1.1: Key facts relating to the Lee Neighbourhood Plan

Name of Responsible Authority	Lee Forum
Title of Plan	Lee Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The LNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Lewisham Local Plan (2011-2026), the key documents of which include the Core Strategy and the Site Allocations Local Plan. Due regard is also given to the New Lewisham Local Plan (2020-2040), and the Royal Greenwich Local Plan (2013-2028).</p> <p>The LNP will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2031
Area covered by the plan	The LNP area covers parts of Lee Green ward and Blackheath ward within Lewisham, and the Middle Park and Sutcliffe ward in the Royal Borough (RB) of Greenwich, in London.
Summary of content	The LNP will set out a vision, strategy, and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>Sarah McMichael, Chair of Lee Forum</p> <p>Email address: mckmicer@gmail.com</p>

SEA Screening for the Lee Neighbourhood Plan

- 1.4 The LNP has been screened in by Lewisham Council as requiring a Strategic Environmental Assessment (SEA).
- 1.5 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, the LNP has been screened in as requiring an SEA process for the following reasons:
 - The Neighbourhood Plan will set the framework for development in environmentally sensitive locations, such as:
 - locations with sensitivity for the historic environment, including nationally designated listed buildings, a registered park and garden, and two conservation areas.
- 1.6 In light of this screening outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

SEA explained

- 1.7 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.8 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the LNP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.9 This is the second document to be produced as part of the SEA process. The first was the SEA Scoping Report (September 2021). This Environmental Report will accompany the submission version of the LNP.

Structure of this SEA Environmental Report

1.10 This document is the SEA Environmental Report for the LNP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the SEA Environmental Report to meet the regulatory³ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁴
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making / SEA process.

³ Environmental Assessment of Plans and Programmes Regulations 2004

⁴ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the Lee Neighbourhood Plan

Local Plan context for the Lee Neighbourhood Plan

- 2.1 The overarching document for the Lewisham Local Plan, the Core Strategy⁵, was adopted in June 2011. This sets out the land use policies to meet Lewisham's economic, environmental, and social needs and aims for the future (up until 2026) and provides the framework for all subsequent documents which form part of the adopted Local Plan. Subsequently, the Site Allocations Local Plan⁶ was adopted by Lewisham Council in June 2013 and sits alongside the Core Strategy. Due regard is also given to the Royal Greenwich Local Plan (2013-2028)⁷, the key document of which is the 'Core Strategy with Detailed Policies' document (adopted in July 2014).
- 2.2 Lee Green is one of seven District Town Centres in Lewisham. It is located around a crossroads and is described as having "*underutilised land with regeneration potential*" within the Core Strategy. Most of the LNP area also falls within an 'Area of Managed Change' within the Core Strategy. These are defined as "*those parts of the Borough which are largely residential or suburban in character and where the urban form and development pattern is established, thereby limiting major physical change*".
- 2.3 Lewisham Council is currently in the process of preparing a new Local Plan for the Borough which will replace the adopted Lewisham Local Plan. Regulation 18 Consultation on the main issues and preferred approaches for the new Lewisham Local Plan (2020-2040)⁸ was completed earlier in 2021.
- 2.4 There is an identified housing need in the LNP area (although the Forum have not been provided with a specific target from Lewisham or the RB of Greenwich) and several suitable sites have been identified through the Neighbourhood Planning process to date, including through a Site Options and Assessment process.
- 2.5 Neighbourhood plans will form part of the development plan for Lewisham and the RB of Greenwich, alongside, but not as a replacement for the Local Plans. Neighbourhood plans are required to be in general conformity with Local Plans and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plans to provide a clear overall strategic direction for development in the Lewisham Borough and the RB of Greenwich, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

⁵ Lewisham Council (2011): 'Lewisham Local Plan: Core Strategy', [online] available to access via [this link](#)

⁶ Lewisham Council (2013): 'Site Allocations Local Plan', [online] available to access via [this link](#)

⁷ RB of Greenwich (2014): Local Plan: Core Strategy and Detailed Policies (2013-2028)', [online] available via [this link](#)

⁸ Lewisham Council (2021): 'About the Lewisham Local Plan', [online] available to access via [this link](#)

Vision, aims, and objectives for the Lee Neighbourhood Plan

2.6 Developed during the earlier stages of plan making and via community consultation, the vision for the LNP is as follows:



We'd like to see Lee be a distinctive and welcoming place attracting people from a wide catchment area to visit, work, study, shop and stay.

We want to see the District Town Centre thrive once more. New development should respect the much-loved heritage architecture and contribute to a sustained local economy and healthy environment.

We want future development to contribute to enhancing the best of Lee's natural heritage assets, and protecting and connecting green infrastructure, particularly a linear park making the River Quaggy a public asset to be enjoyed by all.

Vision Statement for the Lee Neighbourhood Plan



2.7 The vision statement for the LNP is underpinned by the following strategic aims for development during the plan period:

- To protect and enhance green and blue spaces, and to promote new green / blue infrastructure across the Lee Forum area, enhancing its ecological diversity and nature conservation, and to provide opportunities for health-benefiting recreational pursuits throughout.
- To improve air quality, road safety, the vibrancy of our streetscapes, and encourage active travel in and around the Lee Forum area, by providing easy access to more environmentally friendly and healthy modes of transport.
- To maintain, enhance, and increase the community infrastructure in the Lee Forum area in order to ensure that current feelings of community pride, unity, and engagement are nurtured within all age, social, racial, and cultural groups, and can grow alongside the expanding population.
- Building a sustainable neighbourhood by ensuring that new development delivers the right type of environment, social infrastructure and housing that contributes to the creation of socially just, inclusive, and healthy communities.
- To protect and improve local employment workspaces and ensure that the Lee Forum area's retail centres offer a diverse, healthy, vibrant, and enjoyable experience, in order to promote a thriving economy.
- To recognise and protect the heritage assets of the Lee Forum area and protect and enhance the design quality and cohesion of its built environment, both old and new.

3. What is the scope of the SEA?

Summary of SEA Scoping

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.⁹ These authorities were consulted on the scope of the SEA in September 2021.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the LNP.
 - Baseline data against which the LNP can be assessed.
 - The key sustainability issues for the LNP; and
 - An ‘SEA Framework’ of objectives against which the LNP can be assessed.
- 3.4 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Historic England	
<i>Historic Places Adviser (email response received on 11th October 2011)</i>	
The identified Scoping Report appropriately identifies the key heritage considerations and sets appropriate questions against which allocations/proposals can be measured, as such we do not wish to comment in detail.	Comment noted.
We would however draw attention to the archaeological priority area records. These are due to be reviewed in 2022 and have not been the subject of detailed analysis. The proposed review may result in changes to boundaries or identify elements of archaeological interest which may be affected by future allocation/proposals.	Comment noted. A key objective of the Neighbourhood Plan is to ensure that the historic environment is appropriately safeguarded and enhanced through future allocations. This is reflected through policy provisions, and further discussed within the appraisal of the LNP policies presented in Chapter 5 of this Environmental Report.

⁹ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme’.

Consultation response	How the response was considered and addressed
Environment Agency <i>Kent and South London Team (email response received on 11th October 2021)</i>	
We would not wish to make any comments on the SEA Scoping Report consultation for the Lee Neighbourhood Plan.	Comment noted.
Natural England <i>Consultations Team (email response received on 25th October 2021)</i>	
Natural England has no specific comments to make on this neighbourhood plan SEA scoping report.	Comment noted.
However, we refer you to the advice in the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.	Comment noted. The advice within the annex has been a useful reference point during the subsequent stages of the SEA.

3.5 Baseline information (including the context review and baseline data) is presented in Appendix A. The key sustainability issues and SEA Framework are presented below.

Key Sustainability Issues

Air Quality

- NO₂ and PM₁₀ are the key pollutants of concern within the Neighbourhood Plan area, with the Lewisham AQMA primarily designated for exceedances in the annual mean concentration objective for NO₂ and the 24-hourly mean objective for PM₁₀.
- It will be important to consider any potential traffic and congestion issues arising within and surrounding the Neighbourhood Plan area as a result of new development proposals.
- Improvements to the green landscape and streetscape within the LNP area is identified as a potential mechanism to address air quality issues at key locations, particularly surrounding the Leegate Centre, Lee High Road, Lee Road, and Burnt Ash Road/Hill.

Biodiversity and Geodiversity

- Sites of Importance for Nature Conservation (SINCs) represent some of the most significant areas of semi-natural habitat across London outside of statutory protected sites. In this respect, the four SINCs within the LNP area (River Quaggy at Manor House Gardens; Hither Green Railsides; Hither Green Sidings; and River Quaggy and Manor Park) are potentially sensitive to new development proposals.
- There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, predominantly areas of deciduous woodland, traditional orchard, and wood pasture and parkland.

- The Greenspace Information for Greater London (GiGL) database contains records of protected or notable species within the Neighbourhood Plan area. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and reptiles.

Climate Change

- Source data from the Department of Energy and Climate Change suggests Lewisham has also seen a 47.8% reduction and Greenwich a 50.9% reduction 2005 and 2019, slightly lower and slightly higher respectively than the reductions for the London (48.4%) but higher than the reduction for England (37.6%).
- Both London Boroughs of Lewisham and Greenwich declared a climate emergency in 2019, and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible.
- The Neighbourhood Plan should seek to maximise opportunities to support actions in tackling climate change.
- Surface water run-off from development can exacerbate the risk of flooding by increasing the run-off from land to water courses.

Landscape and Townscape

- The need to ensure that development improve the quality of the distinctive character zones within the LNP area, particularly within and surrounding the Lee District Town Centre environment.
- Growing concern that too many new developments are being built without regard to high quality design, and to a height and density which is perhaps less in-keeping with the surrounding environs.
- The prominence of the rail lines limiting connectivity between Lee and Hither Green, disrupting the urban form.
- Whilst many of the LNP area's trees benefit from the protection afforded by Tree Preservation Orders (TPOs), many other locally valued trees are not currently protected.

Historic Environment

- According to the National Heritage List for England, the Neighbourhood Plan area contains 20 listed buildings, including one Grade I listed buildings, one Grade II* listed buildings and 18 Grade II listed buildings.
- There are two conservation areas which wholly or partly overlap with the Neighbourhood Plan area, specifically: Lee Manor, and Blackheath.
- The Grade II listed 'Manor House Gardens' Registered Park and Garden is located within the north western section of the LNP area and is wholly within the Lee Manor Conservation Area.
- It is important to note that the conservation area appraisals are relatively dated (prepared over 10 years ago) and may benefit from an update and

refresh to reflect the latest available information with regards to conserving and enhancing the special qualities of the areas.

- Lee Forum are keen to explore opportunities to designate additional conservation areas within the Neighbourhood Plan area, including at Lee Green Town Centre, Lee High Road, Manor Park, and Cambridge Drive.
- Lee Forum have prepared and submitted a list of 86 locally listed buildings to Lewisham Council and the RB of Greenwich. These assets are highly valued by the community.
- There is concern from Lee Forum that too many new developments are being built without regard to high quality design, with unsympathetic development harming the cohesion of the built environment.
- There is concern from Lee Forum that there is a lack of collective thinking and disjointed planning with regards to heritage considerations between Lewisham and the Royal Borough of Greenwich.

Land, Soil, and Water Resources

- The most recently completed water quality assessments undertaken in 2019 classifies the River Quaggy as having a 'moderate' ecological status and a 'fail' chemical status.
- The Reasons for Not Achieving Good Status (RNAGS) are primarily attributed to the following activities: leaking utility sewers, sewage discharge (intermittent), barriers and misconnections (ecological discontinuity), urban development, and transport drainage.

3.6 Given the urban nature of the Neighbourhood Plan area, with the only opportunities for development being previously developed land, and existing legislative provisions relating to water quality and supply, **the land, soil, and water resources theme has been scoped out of the SEA process.**

Community Wellbeing

- Deprivation is a complex issue, with many factors at play. Barriers to housing and services and the quality of the living environment are identified as key issues within the IMD data.
- Connectivity and cohesion, and the lack of vibrancy and diversification between retail and leisure hubs within the Neighbourhood Plan area, have been identified as key concerns by residents.
- Community infrastructure within the LNP area should provide for and meet health, social, recreational, and educational needs.
- Potential loss of green and blue spaces through new development proposals could disconnect and fragment the wider network of spaces within the Neighbourhood Plan area.
- The role and function of Lee District Town Centre and local hubs in the LNP area is changing in response to (amongst other factors) declining retail provision, a shift in shopping and employment patterns, lack of investment, and the ongoing recovery in response to the Covid-19 pandemic.

Transportation

- The recovery from the Covid-19 pandemic has the potential to change travel patterns in the LNP area in the short, medium and (potentially) longer term.
- Barriers to walking and cycling within the LNP area are associated with a lack of pedestrian crossings and connectivity; noise and pollution levels along key routes into Lee District Town Centre; and road safety concerns.
- The LNP area experiences traffic congestion in the peak hours on all the main approach routes into Lee District Town Centre, including Lee High Road, Lee Road, Burnt Ash Road, Burnt Ash Hill, the A20, and the A205.

SEA Framework

3.7 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’. Each proposal within the current version (i.e. the submission version) of the LNP will be assessed consistently using the framework.

Table 3.2: SEA Framework of objectives and assessment questions

SEA Objective	Assessment questions to consider for the allocations / proposals within the Lee Neighbourhood Plan
Air Quality	
Deliver improvements in air quality within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce emissions of pollutants from transport? • Promote the use of low emission vehicles? • Promote enhancements in sustainable modes of transport, including walking, cycling and public transport? • Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of nitrogen dioxide and other pollutants?
Biodiversity and Geodiversity	
Protect and enhance biodiversity and geodiversity	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the designated biodiversity sites located within proximity to the Neighbourhood Plan area? • Protect and enhance priority habitats and species? • Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Lee Neighbourhood Plan
Climate Change	
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding? • Improve and extend green infrastructure networks in the Neighbourhood Plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water run-off (either within the Neighbourhood Plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Encourage the use of sustainable drainage techniques through new infrastructure provision?
Landscape and Townscape	
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the special qualities of the Neighbourhood Plan area, including through improvements to the public realm and streetscapes? • Conserve and enhance locally important landscape and townscape features within the Neighbourhood Plan area? • Conserve and enhance local diversity and character? • Encourage and support high quality design within the Neighbourhood Plan area, informed by key supporting documents such as the Lewisham Characterisation Study, Lewisham Tall Buildings Study, and the Residential Density Technical Paper?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Lee Neighbourhood Plan
Historic Environment	
<p>Protect, conserve, and enhance heritage assets within the Neighbourhood Plan area</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts? • Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the Greater London HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Conserve and enhance archaeological remains, including historic townscapes?
Community Wellbeing	
<p>Ensure growth in the Neighbourhood Plan area is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure and public realm enhancements? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing residents?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Lee Neighbourhood Plan
<p>Ensure growth in the Neighbourhood Plan area is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure and public realm enhancements? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing residents?
<p>Transportation</p>	
<p>Promote sustainable transport use and reduce the need to travel.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents and the built environment from the road network?

4. What has plan making / SEA involved up to this point?

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, the following sections describe how the SEA process to date has informed the consideration of different approaches for key elements of the LNP.

Overview of plan making / SEA work undertaken since 2016

- 4.3 An application to establish a neighbourhood forum was submitted to Lewisham Council and the Royal Borough (RB) of Greenwich Council in September 2015. Subsequently, Lee Forum (and the LNP area) was designated in January 2016.
- 4.4 Significant public consultation has been carried out to date to support the emerging LNP. This has gathered local views and opinions, with a view to engaging local people throughout the Neighbourhood Plan's development process. This has included (but is not limited to) the following key events, community surveys, and evidence base studies as listed within the Consultation Statement accompanying the LNP (the results of which are accessible on the Forum's website):
- Lee Forum Annual General Meeting (May 2016) and the Manor House Gardens Festival (June 2016). The purpose of both events was to inform and engage the community in the neighbourhood planning process.
 - Key Issues Survey (June 2017), to establish what the community valued about the local area and identifying priorities and concerns to inform the vision and objectives for the LNP.
 - Working groups established to draft the vision and objectives for the LNP (between June 2017 and January 2018).
 - Site Options and Assessment Report (November 2017).
 - Engagement with local businesses and traders within the core retail areas of the LNP area to establish their priorities (July 2018).
 - Lee District Town Centre Design Analysis and Recommendations (September 2018 - April 2019).

- Regulation 14 consultation (July - September 2019), including drop-in consultation events at Leegate Community Centre and Manor House Library. Responses to the consultation were largely favourable.
- Habitats Regulations Assessment (HRA) and SEA Screening Reports (June 2021).

Housing numbers to be delivered through the LNP

4.5 There is an identified housing need in the LNP area, although The Forum has not been provided with a specific housing target from Lewisham Council or the RB of Greenwich. The LNP is supportive in principle of the larger site allocations which are being considered through the emerging New Lewisham Local Plan (2020-2040). Several potential locations for site allocations have also been identified through the neighbourhood planning process to date, including through a site options assessment process (later discussed).

Initial shortlisting of sites

4.6 Lee Forum (with support from an independent planning consultancy) has undertaken initial assessments of the various sites in the LNP area¹⁰ in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation. A total of 27 sites were considered through the assessment process, identified as follows:

- Sites within the latest Strategic Housing and Land Availability Assessments (SHLAA) for the boroughs.
- Community consultation and engagement walks within the area to determine any potential opportunities with vacant or underutilised sites.
- Sites known to the community which have the potential to be brought forward during the plan period.

4.7 Sites were initially discounted on the basis that they were not suitable, available, or achievable; or not favoured by the local community through the consultation process. Further details can be found in the Site Assessment Report accompanying the submission version of the LNP.

4.8 Following the results of the site assessment process, a total of twelve sites were selected as potential locations for mixed-use development within the Regulation 14 version of the Neighbourhood Plan (as consulted on). The sites were all given a 'green' or 'amber' rating within the site assessment report, indicating that the sites are either suitable or potentially suitable for allocation (with some minor constraints to development which would need to be appropriately considered and mitigated through design). This includes eight small brownfield sites within the existing built-up area (all between 0.01 and 0.09 ha), along with four sites which are currently being considered within the emerging New Lewisham Local Plan¹¹, specifically:

- Leegate Shopping Centre.

¹⁰ The initial site assessment report contributes to the evidence base for the emerging LNP.

¹¹ Lewisham Council (2021): 'Lewisham Local Plan Part 3: Lewisham's Neighbourhoods and Places', [online] available to access via [this link](#)

- Sainsburys, Lee Green.
- Lee High Road and Lee Road; and
- Travis Perkins and Citroen Garage.

4.9 The potential site allocations, which are listed below in **Table 4.1**, are located within Lewisham, as shown in the figure below.

Table 4.1: Allocated sites within the Lee Neighbourhood Plan

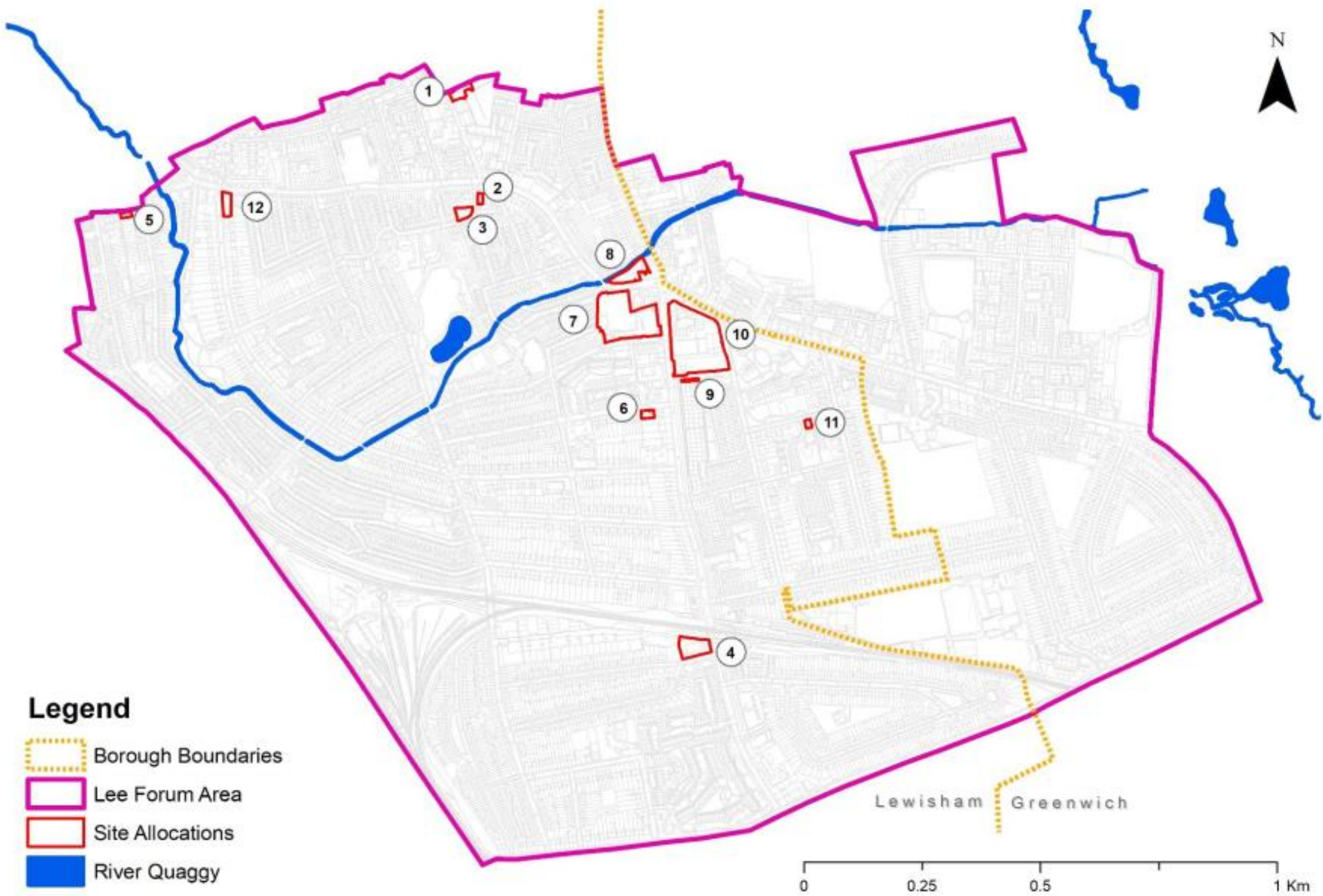
SEA ID	Name of site, address ¹²	Size (Ha) ¹³
Site 1	Land off Dacre Park, Adjacent to Allotments	0.09
Site 2	Land on Old Road	0.02
Site 3	Old Road Depot	0.08
Site 4	Garage Site on Burnt Ash Hill*	0.54
Site 5	Site of Disused Garages on Wisteria Road	0.02
Site 6	Effingham Road	0.10
Site 7	Sainsbury's Site*	1.04
Site 8	Site at 321-341 Lee High Road, SE12 8RU*	0.21
Site 9	Disused Lockup Garages off Burnt Ash Road	0.02
Site 10	Leegate Shopping Centre*	1.46
Site 11	Corner of Millbank Way and Osberton Road	0.02
Site 12	Vehicle Hire Corner of Lee High Road and Manor Park	0.09

4.10 As described within Chapter 2 of this Environmental Report, most of the LNP area falls within an 'Area of Managed Change' within Lewisham's Core Strategy (adopted in June 2011). These are defined as *"those parts of the Borough which are largely residential or suburban in character and where the urban form and development pattern is established, thereby limiting major physical change"*. In this respect, it is anticipated that most of the change (beyond those larger sites which have been identified through the emerging New Lewisham Local Plan) will be small-scale development, with a preference for the regeneration of previously developed land.

4.11 In the context of the above, the LNP is prioritising the regeneration of previously developed sites, alongside exploring what opportunities may exist with some of the larger sites which are being put forward through the emerging New Lewisham Local Plan.

¹² Sites with an asterisk are those which are proposed allocations through the emerging New Lewisham Local Plan, some of which have previously been granted planning permission which has since elapsed.

¹³ Represents total site size and not necessarily total developable area and is taken from the LNP.



Legend

-  Borough Boundaries
-  Lee Forum Area
-  Site Allocations
-  River Quaggy

Lewisham Greenwich

0 0.25 0.5 1 Km

Options considered through the SEA process

- 4.12 The sites currently being taken forward by the Forum as Neighbourhood Plan allocations are either those which have been allocated through the emerging New Lewisham Local Plan (2020-2040) or comprise smaller brownfield sites.
- 4.13 These sites mirror the proposals set out in the Local Plan and reflect in planning policy terms both the provisions of the Local Plan and the London Plan. For this reason, the SEA process has not considered site options as reasonable alternatives. This is given the allocations taken forward through the LNP are in general conformity with the provisions of the Local Plan and the policies of its umbrella spatial development strategy (the London Plan).
- 4.14 The SEA process has instead considered options for another key element of the LNP, the Leegate Centre.
- 4.15 Located within a prominent position in Lee District Town Centre, the Leegate Centre is the largest site in the LNP area and currently comprises Leegate Shopping Centre (constructed in the 1960s), two office blocks (Leegate House and Cantilever House), a multi-level car park, a community centre and housing. As stated within the emerging New Lewisham Local Plan (2020-2040), the site has an indicative development capacity of 450 residential units together with 805m² of employment floorspace and 5,449m² of main town centre use floorspace. It is recognised as being key to the renewal and revitalisation of the town centre environment and will play a critical role in linking sites and neighbourhoods surrounding it.
- 4.16 The Leegate Centre was not initially identified as an appropriate site allocation for consideration through the LNP, as it had existing planning permission during the completion of the site assessment process. This planning permission has elapsed, and the site has since been bought by Galliard Homes (the site promoter). In this respect, the regeneration of the Leegate Centre has been identified as a key priority for the local community, as informed by public consultation events and via responses to both the design guidance for the LNP and the extant planning permission for the site.
- 4.17 There is a high demand for housing and employment space within Lewisham Borough. To meet these needs, Lewisham Council have been considering options relating to how it intends to plan for high densities and taller buildings, including through relevant evidence studies such as the Lewisham Characterisation Study (2019), Residential Density Technical Paper (2020), and the Tall Buildings Study (2021). These documents are available to access on the [Design and Character](#) evidence page for the emerging New Lewisham Local Plan.
- 4.18 Recent planning applications and discussions between Lewisham Council and Historic England has placed an impetus on evaluating the potential impact of tall buildings on the setting of the historic environment. The emerging New Lewisham Local Plan (Regulation 18 version as considered by Lewisham Council in November 2021)¹⁴ and the Mayor of London's London Plan (2021)¹⁵

¹⁴ Lewisham Council (2020): 'New Lewisham Local Plan: Regulation 18 stage "Main Issues and Preferred Approaches" document', [online] available to access via [this link](#)

¹⁵ Mayor of London (2021): 'The London Plan', [online] available to access via: [this link](#)

also sets clear conditions for the development of taller buildings within district centre environments, including the following guidelines:

- Part Two (Section QD4 – Building Heights) within the emerging New Lewisham Local Plan states that proposals for tall buildings will be required to demonstrate that the development “is designed with building heights that are sensitive to the site’s immediate and wider context” and “will not result in adverse visual, functional, environmental and cumulative impacts”.
- Paragraph 5.31 within the New Lewisham Local Plan also states that “Whilst acknowledging that London’s skyline has and will continue to evolve over time, there remains an imperative to protect and enhance the distinctiveness and character of Lewisham’s neighbourhoods.”
- Paragraph 5.34 within the New Lewisham Local Plan states that proposals for taller buildings (two to three storeys above the surrounding area) “must demonstrate an understanding of the site context, including the historic pattern of development in a locality.
- Design Policy D9 ‘Tall Buildings’ within the London Plan (2021) states that (amongst other considerations) “particular attention should be paid to form and proportions. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.” Concerning “immediate views from the surrounding streets”, the base of the tall building “should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street.

4.19 Existing proposals for the Leegate Centre which have been put forward by the site promoter proposes a building height of up to 15 storeys (with a view to unlocking and delivering a higher proportion of social and affordable housing). However, in light of the evidence presented above in relation to the development of tall buildings in the Borough, the Forum were keen to explore an alternative option which considers a building height of up to eleven storeys. This more limited building height would not exceed the height of the existing buildings within Lee District Town Centre.

4.20 On this basis, two options have been considered through the SEA process to explore the relative sustainability merits of these two approaches. These are as follows:

- Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.
- Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Appraisal findings

4.21 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through the seven SEA Themes, as follows:

- Air Quality.
- Biodiversity and Geodiversity.

- Climate Change.
- Landscape and Townscape.
- Historic Environment.
- Community Wellbeing; and
- Transportation.

4.22 The appraisal considers the relative sustainability merits of each of the options. Findings are presented as a commentary on effects. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options in relation to each theme considered.

4.23 Sources of information to support the appraisal has included (amongst others): Ordnance Survey maps; MAGIC Interactive Map¹⁶; the Environment Agency's Flood Risk Maps for England¹⁷; Google Earth¹⁸; interactive maps and documents available to access on Lewisham Council and RB of Greenwich's webpages; national and local planning policy documents; and baseline studies provided by Lee Forum.

4.24 **Table 4.2** to **Table 4.8** below present the findings of the appraisal of the site options for each of the seven SEA Themes.

¹⁶ MAGIC (2021): 'Interactive Map', [online] available to access via [this link](#)

¹⁷ Environment Agency (2021): 'Flood Map for Planning', [online] available to access via [this link](#)

¹⁸ Google (2021): 'Google Earth', [online] available to access via [this link](#)

Table 4.2: Appraisal findings: Air Quality

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>Air pollution is a significant issue across London, and the whole of the LNP area is within the Lewisham Air Quality Management Area (AQMA). In the context of the Leegate Centre, it will be important for development proposals to take account of, attempt to improve, and not worsen the air polluted and congested junction between the A20 (Lee High Road and Eltham Road), the B212 (Lee Road) and the A2212 (Burnt Ash Road).</p> <p>Option A, through delivering a higher building height, has the potential to accommodate a higher number of residential dwellings within the Leegate Centre. By providing additional housing in comparison to Option B, this is likely to increase the number of people accessing the site (including potentially via private vehicles), which may exacerbate air quality issues in the vicinity of the site. However, this is dependent on the extent to which the development proposals for the Leegate Centre incorporate appropriate avoidance and mitigation measures to help limit the impacts of air quality on sensitive receptors. This may include through measures which seek to encourage active travel to the site, which is perhaps more readily achievable given the relatively central location of the Leegate Centre within Lee District Town Centre, and its accessibility to key public transport nodes such as bus stops and Lee railway station. This could also include incorporating green infrastructure in the design to maximise the dispersal of pollutants, particularly in the most sensitive locations (i.e. adjacent to the existing road network). Such measures are possible through both Option A and Option B. In this respect, it is considered that the air quality effects would be comparable for both options.</p>	=1st	=1st

Table 4.3: Appraisal findings: Biodiversity and Geodiversity

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>There are no Ramsar Sites, Special Areas of Conservation, Special Areas of Conservation, Sites of Special Scientific Interest (SSSI), or Sites of Importance for Nature Conservation located within or within proximity to the LNP area. Additionally, the LNP area does not overlap with SSSI Impact Risk Zones for the types or scales of development which are likely to be brought forward at the Leegate Centre. In this respect, neither option will impact on the integrity of designated sites for biodiversity and/or geodiversity within the LNP area.</p> <p>The significance of the effects from each option on features and areas of biodiversity and/or geodiversity interest largely depends on the design and layout of development and the incorporation of enhancement measures. As such, both options have the potential to lead to impacts on biodiversity and/or geodiversity if development is not undertaken to support and enhance the habitats and species which may be present.</p>	?	?

Table 4.4: Appraisal findings: Climate Change

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>With reference to climate change mitigation, both options will deliver development in a location which will support sustainable transport use (including walking, cycling, and public transport) and in proximity to services and facilities within Lee District Town Centre. Option A, through delivering increased building heights, has the potential to deliver higher density development. This has the potential to help limit emissions on a per capita basis. Nonetheless, effects are also dependent on the extent to which the proposals integrate energy efficient measures (including renewable energy) through design which will help limit per capita emissions and contribute to the Vision Zero ambition for the London Plan (2021). In this respect, it is anticipated that both options have the potential to positively contribute to climate change mitigation efforts.</p> <p>In relation to flood risk, the northern and western sections of the Leegate Centre site are within Flood Zone 2 and 3. It is not possible to differentiate between the options in this regard given that the potential effects depend on the design and layout of development and the incorporation of appropriate mitigation measures such as sustainable drainage systems. It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.</p> <p>In terms of the wider elements relating to climate change, for example relating to the urban heat island effect, this also depends on the provision of appropriate infrastructure alongside new housing or employment uses, such as green infrastructure provision, and appropriate design and layout.</p>	=1st	=1st

Table 4.5: Appraisal findings: Landscape and Townscape

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>The Lee District Town Centre environment primarily comprises buildings which are two to three storeys in height, alongside two isolated buildings (constructed in the 1960s) which are approximately ten or eleven storeys in height and anomalous for the rest of the Town Centre. In this respect, Option A has the potential to have a greater impact to the surrounding townscape character of Lee District Town Centre in comparison to Option B. This includes on impacting upon the setting of the streetscape (particularly the immediate vicinity surrounding Lee Green crossroads and pavements), and locally important viewpoints (including some longer-distance views over to the horizon / city skyline, and from within the surrounding conservation areas) through creating a relatively imposing structure which is less well integrated into the townscape. This is further considered within the 'Historic Environment' appraisal section below.</p>	2nd	1st

Table 4.5: Appraisal findings: Landscape and Townscape

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

<p>With reference to local landscape and townscape features of interest, the three mature TPO London Plane trees (<i>Platanus x hispanica</i>) at the north eastern corner of the Leegate Centre should be retained and enhanced where possible through new development areas. While taller buildings have the potential to block or dapple sunlight within the vicinity of the Leegate Centre, it is anticipated that the effects to these features would be comparable through both options. Nonetheless, it will be important to ensure that the landscaping scheme for the Leegate Centre (including the street frontages) respond sympathetically to the existing tree planting. Overall, increased building heights taken forward through Option A would have additional potential to lead to adverse impacts on townscape character given existing building heights in the area.</p>		
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Table 4.6: Appraisal findings: Historic Environment

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>With reference to the historic environment, there are two Grade II listed buildings within proximity to the Leegate Centre. This includes Lee Green Fire Station (directly to the north, on the opposite side of Eltham Road) and the Police Station (approximately 50m to the north west of the site, along Lee High Road). There is also a corridor of four Grade II listed buildings (residential property numbers 56, 58, 60, and 62 along Burnt Ash Hill) located approximately 100m to the south of the site, and which are within the Lee Manor Conservation Area. There are also several locally listed buildings surrounding the Lee Green Crossroads (i.e. the area directly at the north western site boundary). Furthermore, the Leegate Centre is approximately 150m to the east of Lee Manor Conservation Area, and adjacent to the Lee Green Town Centre Conservation Area (which is a proposed designation through the LNP). In this context, inappropriate development at the Leegate Centre (through both Option A and Option B) has the potential to have impacts on the integrity of a range of historic environment assets, with tall buildings having the potential to lead to significant impacts on the settings of key features and areas of interest. Regarding the setting of heritage features and areas, concerns raised by Lee Manor Society (dated in April 2021) suggest that taller buildings (as proposed through Option A) are likely to be visible through gaps in the mature trees at Manor House Gardens Registered Park and Garden, which is located approximately 350m to the west of the Leegate Centre (within the boundary of Lee Manor Conservation Area). The additional building height proposed through Option A also has the potential to be visible from a greater number of locations along Burnt Ash Road, Leyland Road, Lee Road, Lee High Road, and Eltham Road in comparison to Option B. While building height alone is perhaps less likely to significantly detract from the overall character of the existing viewpoints from these locations (which are largely urban / sub-urban in their character), taller building heights have an</p>	2nd	1st

Table 4.6: Appraisal findings: Historic Environment

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

<p>increased potential to have an imposing presence on the surrounding townscape (and to the significance of heritage assets and areas). Overall, whilst the significance of the effects arising from each option on features of cultural, built and archaeological heritage assets (and their settings) would depend on the nature of development and the extent to which appropriate mitigation measures are incorporated into the design of new development areas, it can be considered that Option A would have additional potential to lead to direct and indirect impacts on the significance of the historic environment locally.</p>		
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Table 4.7: Appraisal findings: Community Wellbeing

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>It is important to recognise that the comprehensive redevelopment of the Leegate Centre through both options will likely deliver a significant amount of new housing together with modern retail and employment space, leisure, community, and cultural facilities to support the long-term vitality and viability of Lee District Town Centre. However, higher building heights at the Leegate Centre through Option A will likely provide a greater proportion of dwellings of a range of types and tenures, meeting housing needs, and has the potential to deliver additional community and employment uses. With reference to residents' quality of life, both options will deliver development in locations which will support sustainable transport use (including walking, cycling, and public transport) and in proximity to services and facilities within Lee District Town Centre. This will encourage active lifestyles, with links to physical and mental health and wellbeing, and support accessibility to key amenities in the area. With reference to social inclusion, there is evidence to suggest that residents living in taller buildings (particularly on the upper floors of taller buildings) have the potential to feel more isolated and alienated from their surrounding environments. In this respect, Option A is perhaps less likely to support social inclusion in comparison to Option B. More broadly in relation residents' quality of life, Option B would likely ensure that appropriate proposals were initiated to limit the impacts of taller buildings on the quality of residential environments, including relating to such buildings blocking out light. By limiting the height to eleven storeys, this will be in-keeping with the existing tall buildings in Lee District Town Centre. This is further discussed within the 'Landscape and Townscape' and 'Historic Environment' appraisal sections, presented above. The quality of the public realm and street-scene (including the width of pavements, the number and location of trees, quality of lighting, paving and signage, and appropriate space for encouraging active travel), along with the ground-floor business experience for residents and the wider economical context for the Leegate Centre and are also important considerations. In this respect, the potential impacts relating to the</p>	?	?

Table 4.7: Appraisal findings: Community Wellbeing

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Community Wellbeing SEA theme are also likely to be significantly influenced by factors which are not directly linked to the height of buildings.		
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Table 4.8: Appraisal findings: Transportation

Option A: Consideration of a higher building height of up to 15 storeys for the Leegate Centre.

Option B: Consideration of a lower building height of up to 11 storeys for the Leegate Centre.

Discussion of potential effects and relative merits of options	Rank of preference	
	A	B
<p>In the context of the Leegate Centre, it will be important for development proposals to take account of, attempt to improve, and not worsen the congested junction between the A20 (Lee High Road and Eltham Road), the B212 (Lee Road) and the A2212 (Burnt Ash Road). Option A, through delivering a higher building height, has the potential to accommodate a higher number of residential dwellings within the Leegate Centre. By providing additional housing in comparison to Option B, this is likely to increase the number of people accessing the site (including potentially via private vehicles), which may exacerbate congestion issues in the vicinity of the site. Such effects are likely to be limited by the highly accessible location of the site in terms of its proximity to key transport links, including bus services, and from Lee railway station, rail services. However, this is dependent on the extent to which the development proposals for the Leegate Centre incorporate appropriate avoidance and mitigation measures to help limit the impacts. This may include through measures which seek to encourage active travel to the site, which is perhaps more readily achievable given the relatively central location of the Leegate Centre within Lee District Town Centre.</p> <p>Reflecting the above, it is considered that the transportation effects would be comparable for both options. However, it should also be noted that Option A will deliver increased amounts of development in a highly accessible location by sustainable modes of transport, which is positive for the Transportation SEA Theme.</p>	=1st	=1st

Preferred approach taken forward by the Neighbourhood Plan

4.25 Following the consideration of the local planning context, wider evidence studies, and the findings of the SEA, the Forum’s preferred approach is for the Leegate Centre is to include lower building heights of up to eleven storeys (Option B).

4.26 It is useful to highlight that the building height is one of several considerations which The Forum (as informed by community consultation with the wider

Leegate Steering Group) identify as integral for the regeneration of the Leegate Centre. Additional considerations include (but are not limited to)¹⁹:

- The ground-floor business experience for residents and the wider economical context for Leegate (in recognition as its role as a District Hub).
- Outlining the longer-term vision for Leegate to appropriately unlock its potential as a leisure and commercial hub for the community (in addition to delivering new housing).
- Detailed design considerations to ensure that the scheme appropriately reflects and responds to the architectural quality and massing, the historic environment (both designated and non-designated heritage assets), and the surrounding townscape character.
- The quality of the public realm and street-scene (including the width of pavements, the number and location of trees, quality of lighting, paving and signage, an appropriate space for encouraging active travel).

4.27 These considerations have informed LNP policy development and are further discussed in the appraisal of the LNP policies in Chapter 5 of this Environmental Report.

Current approach in the Lee Neighbourhood Plan and the development of policies

Choice of sites taken forward for the purposes of the Lee Neighbourhood Plan

4.28 The submission version of the LNP presents design provisions for twelve sites in the Neighbourhood Plan area. These are set out through Policies SA01 - SA12 and the Design Code which accompanies the LNP.

Neighbourhood Plan policies

4.29 To support the implementation of the vision statement for the Neighbourhood Plan, the current version (i.e. the submission version) of the LNP puts forward 35 policies to guide development within the LNP area. Earlier draft versions of the policies have been revisited and updated in light of the responses which were received at Regulation 14 consultation, and through recommendations and suggestions proposed the SEA process to date.

4.30 Policies were developed following extensive community consultation and evidence gathering and are listed below in **Table 4.9**.

Table 4.9: Neighbourhood Plan policies

Reference	Policy Name
Green and Blue Spaces	
Policy GB1	Protection and Enhancement of Green Spaces
Policy GB2	Achieving a Green Infrastructure-led Development Approach
Policy GB3	Designation of Nature Improvement Areas: River Quaggy Trail and Hither Green Nature Trail

¹⁹ These considerations were raised by the local community during a consultation event on the proposals for the Leegate Centre (dated July 2021).

Reference	Policy Name
Policy GB4	Protection and Increase of Tree Cover
Policy GB5	Managing Flood Risk
Policy GB6	Protection and Enhancement of Lee's Playing Fields
Transport and Connectivity	
Policy TC1	Protect, Promote and Enhance Public Transport
Policy TC2	Improve Measures to Reduce Pollution Levels
Policy TC3	Improve Active Travel Options and Road Safety Measures in the Forum Area
Building Homes and Amenities	
Policy BHA1	Protection, Enhancement and Provision of Community Buildings
Policy BHA2	Protection, Enhancement and Provision of Social Infrastructure
Policy BHA3	Enhancement of Public Realm Facilities
Policy BHA4	Housing Delivery
Policy BHA5	Windfall Sites
Policy BHA6	Design of New Development
Policy SA01	Land off Dacre Park, Adjacent to Allotments
Policy SA02	Land on Old Road
Policy SA03	Old Road Depot
Policy SA04	Garage Site on Burnt Ash Hill
Policy SA05	Site of Disused Garages on Wisteria Road
Policy SA06	Effingham Road
Policy SA07	Sainsbury's Site
Policy SA08	Site at 321-341 Lee High Road, SE12 8RU
Policy SA09	Disused Lockup Garages off Burnt Ash Road
Policy SA10	Leegate Shopping Centre
Policy SA11	Corner of Millbank Way and Osberton Road
Policy SA12	Vehicle Hire Corner of Lee High Road and Manor Park
Local Retail, Leisure and Economy	
Policy RLE1	Maintain, Improve and Sustain the Diversity, Vitality and Viability of Retail Sites
Policy RLE2	Improve Shopfronts and Advertising in Retail Sites
Policy RLE3	Improve and Enhance the Public Realm of Retail / Cultural Activity Sites
Policy RLE4	Protect and Encourage Local Employment Sites
Policy RLE5	Revitalise Lee Green District Town Centre
Heritage and Design	
Policy HD1	Designation, Conservation and Enhancement of Heritage Assets
Policy HD2	Design and Scale of New Development
Policy HD3	Extensions, Alterations and New Buildings

5. What are the appraisal findings at this current stage?

Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the LNP. This chapter presents:

- An appraisal of the current version (i.e. the submission version) of the LNP under the seven SEA Theme headings; and
- The overall conclusions at this current stage.

Appraisal of earlier versions of the LNP policies

5.2 Prior to the finalisation of the submission version of the LNP, the SEA process to date (through regular communication and correspondence with the Forum) has provided recommendations and suggestions to inform policy development.

5.3 Alongside the Regulation 14 responses, these recommendations and suggestions have been considered by plan makers during updates to the LNP.

Approach to this appraisal

5.4 The appraisal of the submission version of the LNP is presented below and is structured under the seven SEA Themes.

5.5 For each SEA Theme, 'significant effects' of the submission version of the LNP on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment, as appropriate.

5.6 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the LNP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Air Quality

5.7 Increased population levels and economic and employment growth in Lewisham and the RB of Greenwich have led to an increased demand for travel that is impacting on traffic levels within the boroughs, particularly on the approaches to the key local centres (including Lee District Town Centre). Increases in traffic flows have led to an emerging pattern of congestion on key corridors, with increasing delays and journey times. These issues have contributed to the designation of the Lewisham Air Quality Management Area (AQMA) which has observed increases in the annual mean concentration

objective of $40 \mu\text{g m}^{-3}$ for nitrogen dioxide (NO_2) and 24-hourly mean concentrations for particulate matter (PM_{10}). The whole of the LNP area is within the Lewisham AQMA.

- 5.8 With reference to the proposed site allocations (and more widely applied to all development proposals which may come forward during the plan period), Policy GB2 (Achieving a Green Infrastructure-led Development Approach) identifies the importance of delivering measures which seek to improve air quality in the LNP area. Measures listed in the policy include the addition of landscape buffers within the design of schemes, such as planters, trees and hedges between highways and pedestrian areas, as a mechanism to slow down traffic and address poor air quality.
- 5.9 There is a Healthy Street Neighbourhood Scheme (HN) proposed by London Borough of Lewisham called 'Lewisham and Lee Green HN', which encompasses most of the LNP area. The HN scheme applies Transport for London's Liveable Neighbourhoods concept to the local area, which seek to encourage active and sustainable transport. This will also have indirect and positive benefits to air quality through aiming to reduce the reliance on private vehicles and encourage low-traffic neighbourhoods. Key policies in this respect include Policies TC1 - 3 and are explored in further detail within the 'Transportation' SEA appraisal section, later in this chapter.
- 5.10 More broadly, the provision of enhanced green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas, including through removing different types of air pollution (i.e. particulate matter, sulphur dioxide, nitrogen dioxide and ozone). Biodiversity net gain can also deliver air quality benefits at the microscale. Key policies in this respect includes Policy GB1 (Protection and Enhancement of Green Spaces) and Policy GB4 (Protection and Increase of Tree Cover), with proposals expected to incorporate resilient green and blue infrastructure and boost biodiversity. The provisions of these policies will also facilitate increased absorption and dissipation of NO_2 and other pollutants. This will positively contribute to one of the key objectives of Lewisham's Air Quality Action Plan (AQAP) 2016-2021 which is to reduce levels of pollution within the AQMA to below objective levels and improve air quality in London as a whole.

Biodiversity and Geodiversity

- 5.11 To ensure the European Directives were operable in the UK after the end of the EU transition period, changes were made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. In this respect, SPAs and SACs in the UK no longer form part of the EU Natura 2000 ecological network. Instead, the 2019 Regulations propose the creation of a national site network within the UK territory²⁰. The network comprises the designated sites already designated under the Nature Directives (i.e. 79/409/EEC and 92/43/EEC), along with any additional sites which are designated under the 2019 Regulations. The national site network continues to operate in parallel with other designations and contributes towards the UK's international commitments for protected areas.

²⁰ DEFRA (2021): Policy Paper: Changes to the Habitats Regulations 2017', [online] available to access via [this link](#)

- 5.12 With reference to the LNP proposals (including the proposed site allocations through Policies SA01 - SA12), correspondence from Natural England advises that the LNP proposals do not have the potential to adversely impact the integrity of national site network sites. In this respect, the LNP is accompanied by a Habitats Regulation Assessment (HRA) screening decision²¹ which excludes the requirement for an appropriate assessment.
- 5.13 The proposed site allocations do not overlap with SSSI Impact Risk Zones (IRZ) for the types of development likely to come forward during the plan period. Nonetheless, one of the key objectives within the LNP is to respect and enhance the natural environment. This is recognised and acknowledged within several policies which will 1) help limit potential effects on features and areas of ecological interest and 2) support the resilience of green and blue infrastructure networks. This is further discussed below.
- 5.14 Published in July 2021, paragraph 174 (d) within the revised NPPF²² states that planning policies and decisions should contribute to and enhance the natural and local environment by *'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks'*, with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan²³ (which was published in January 2018) and the Environment Act²⁴ (which received Royal Assent in November 2021). In this regard, Policy GB1 (Protection and Enhancement of Green Spaces) and Policy GB2 (Achieving a Green Infrastructure-led Development Approach) outlines support for proposals which would achieve net gains for biodiverse green spaces and benefit wildlife.
- 5.15 The nature, scale, timing, and duration of some development activities can result in the disturbance of protected species. This can include effects of poor air quality on designated sites, and severance of ecological networks from new development areas. In this respect, the LNP also sets out a range of provisions which will support and enhance habitats, species, and ecological networks.
- 5.16 For example, Policy GB4 (Protection and Increase of Tree Cover) requires proposals to demonstrate how the design options creatively incorporate existing trees into new development areas and maximise the potential for new trees and hedges to be planted. Policy GB3 (Designation of Nature Improvement Areas (NIAs): River Quaggy Trail and Hither Green Nature Trail) seeks to improve green and blue corridors within the LNP area and embrace opportunities for nature conservation. A coordinated approach to delivering the improvement areas is encouraged to maximise the positive outcomes for wildlife and the local community. This includes through improving connections between Sites of Importance for Nature Conservation (which represent some of the most significant areas of semi-natural habitat across London) to form eco-sensitive linear trails. These provisions will safeguard and enhance areas which are

²¹ Lewisham Council (June 2021): Lee Neighbourhood Plan Habitats Regulation Assessment Screening Report, report provided by Lee Forum, contributing to the evidence base for the submission version of the Lee Neighbourhood Plan

²² DLUHC (2018): 'Revised National Planning Policy Framework', [online] available to access via [this link](#)

²³ DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via [this link](#)

²⁴ GOV.UK (2021): 'Environment Act', [online] available to access via [this link](#)

likely to provide roosting and foraging sites for protected species, maintaining habitat connectivity and reducing fragmentation.

- 5.17 Overall, Neighbourhood Plan policies should ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains. Nonetheless, **the SEA recommends** that developers also consider utilising the Government's latest available biodiversity metric tools (e.g. at the current time, the latest version is v3.0, which was published by Natural England and Defra in July 2021). This includes a specific metric for smaller development sites (which is likely to be appropriate for the eight smaller brownfield sites proposed through the LNP) and an 'environmental benefits from nature tool' which aims to maximise the benefits from delivering net gains.

Climate Change

- 5.18 The UK Government has outlined a commitment to secure a 'green recovery' from the COVID-19 pandemic. Reflecting the conclusions of the Institute for Government's 'Net Zero' report²⁵, a green recovery is only likely to happen if net zero becomes a core part of the Government's thinking and its economic policy. Within the report, net zero is described as *"decarbonising not just the power sector but much more difficult sectors including transport, housing and agriculture, where progress has long been stalled and the UK is off track"*. In this respect, policies, and proposals within the LNP seek to reduce the reliance on fossil fuels and support the introduction of low carbon technologies.
- 5.19 Key policies in this regard include Policy BHA3 (Enhancement of Public Realm Facilities) and Policy BHA6 (Design of New Development), stipulating that proposals should align with the London Plan's principles of 'be Lean, be Clean, be Green, be Seen' and incorporate the highest levels of energy efficient technology. Policy HD1 (Designation, Conservation and Enhancement of Heritage Assets) recognises the importance of sympathetically retrofitting existing buildings to enhance their energy efficiency whilst also respecting and maintaining their character and heritage value. In terms of tackling the climate crisis, the provisions of these policies will also help to positively contribute to Lewisham Council's ambition to reach 'net zero' carbon emissions by 2050.
- 5.20 Policy BHA3 and Policy TC3 within the LNP also encourages the use of electric vehicles (EV), with an objective to ensure that new developments are delivered in appropriate settings to cater for growths in EV uptake. However, a reduction in transport carbon emissions cannot solely rely on the switch to EV alone, particularly given that for many residents, an electric car will remain unaffordable. In this regard, the LNP also outlines several proposals which seek to further reduce the reliance on fossil fuels. Such proposals include delivering more active travel infrastructure, encouraging a healthy-streets approach to the design of new development areas by enhancing opportunities for walking and cycling, and improving public transport options (including the number and frequency of journeys). Key policies in this respect include Policies TC1 – 3 (considered further within the 'Transportation' appraisal,

²⁵ Institute for Government (2020): 'Net zero: how government can meet its climate change target'. [online] available to access via [this link](#)

presented below) and will positively contribute to climate change mitigation efforts by encouraging the use of sustainable transport options.

- 5.21 With reference to the proposed site allocations, the following sites are wholly or partially within Flood Zone 2 and/or Flood Zone 3: Sainsbury's Site (Policy SA07); Site at 321-341 Lee High Road, SE12 8RU (Policy SA08); and Leegate Shopping Centre (Policy SA10). In this respect, Policy GB5 (Managing Flood Risk) require proposals to complete a site-specific flood risk assessment to demonstrate how any flood risk issues would be appropriately mitigated. Policy GB5 also encourages the use of permeable materials and natural features through design (including through sustainable drainage solutions and open spaces) to address any flood risk concerns.
- 5.22 With regards to adapting to the effects of climate change, Policy GB2 (Achieving a Green Infrastructure-led Development Approach) stipulates that proposals should demonstrate how they intend to tackle issues relating to the urban heat island effect and managing storm-water runoff. Measures listed within Policy GB2 include (but is not limited to) incorporating landscape buffers such as rain gardens, tree-lined boulevards, planters and hedges, green roofs, and walls. The policy also indicates that measures should be proportionate to the size of the scheme and accompanied by an appropriate management or maintenance plan to ensure that benefits of such measures are secured in the medium to longer term. Additionally, the protection of open spaces and habitats within the LNP area through the provisions of Policy GB1 (Protection and Enhancement of Green Spaces) and Policy GB4 (Protection and Increase of Tree Cover) will safeguard natural carbon sequestrators located within the landscape (i.e. trees and hedgerows). These policy provisions will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter, reducing the urban heat island effect, and reducing surface water run-off issues.

Landscape and Townscape

- 5.23 Landscape and townscape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape and townscape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. The quality and diversity of architecture in Lee is a defining feature and contributes strongly to Lee's sense of place and quality of its environment. In this context, proposals within the LNP have a strong focus on protecting the sense of place and special qualities of within the LNP area which contribute to its character.
- 5.24 With reference to the proposed site allocations, Policy GB1 (Protection and Enhancement of Green Spaces) requires that a landscape scheme is developed for the larger site allocations (i.e. developments of ten or more dwellings, or at least 150 sqm of retail or employment space), which should demonstrate how improvements are to be achieved. This will facilitate opportunities for high quality design and layout to be incorporated within new development areas which are sensitive to the character of the surrounding environment. More broadly, Policy HD2 (Design and Scale of New Development) requires all new development to complement, enhance and

positively contribute to local character and identity, including in relation to the following factors: scale, massing, colours, architecture, materials, street-scene, form, and function. Alongside the Design Code which accompanies the submission version of the LNP, the site-specific provisions through Policies SA01 - SA12 also have a strong focus on delivering high-quality design.

- 5.25 With reference to non-residential proposals which come forward during the LNP period, Policy RLE2 (Improve Shopfronts and Advertising in Retail Sites) stipulates that proposals which include shopfronts, advertisements and signages should complement and enhance the character, proportions, materials and detailing within the building and the wider street-scene. Additionally, Policy RLE5 supports a master planning approach to future development within Lee Green District Town Centre which, amongst other considerations, integrates with the existing buildings of townscape merit, delivers buildings which complement the height of the surrounding buildings and minimise visual impacts, and provide street-based layouts which follow the vernacular and form of the local high street.
- 5.26 Policy GB2 (Achieving a Green Infrastructure-led Development Approach) also encourages proposals to make a positive contribution to the public realm through biodiversity and green infrastructure provision. Specifically, the policy outlines that proposals should deliver a net greening within the LNP area, avoiding areas of hard landscaping wherever possible. By ensuring that new green infrastructure is accompanied by an appropriate management and/or maintenance plan so that such spaces do not fall into disrepair, Policy GB2 signals a strong commitment to delivering positive longer-term outcomes and aspirations in this respect. These provisions should further ensure that proposals reflect the character and sense of place of the LNP area.
- 5.27 More broadly, enhanced habitats (trees, hedgerows, grass, shrub, etc.,) can also form important parts of landscape and townscape character, enhancing the street scene and providing screening to restrict undesirable views. A key policy in this regard includes Policy GB4 (Protection and Increase of Tree Cover) which seeks to ensure that design options incorporate existing trees and maximise the potential for new trees to be delivered within the scheme. The removal of trees which are subject to Tree Preservation Orders (TPOs) is discouraged through Policy GB4, and only supported in the exceptional circumstances listed within the policy.
- 5.28 In addition, the LNP supports landscape and townscape character through setting out a range of provisions relating to the conservation and enhancement of the historic environment. This is discussed in more detail within the 'Historic Environment' appraisal, below.
- 5.29 Overall, the LNP policies have a strong focus on protecting and enhancing landscape and townscape character, the quality of the public realm, and local distinctiveness.

Historic Environment

- 5.30 The LNP area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally valued for their heritage interest. This includes 20 listed buildings (one Grade I, one Grade II*, and 18 Grade II), Lee Manor Conservation Area (which includes the Grade II listed

'Manor House Gardens' Registered Park and Garden), Blackheath Conservation Area, and 86 locally listed buildings. The Grade II listed 'Manor House Gardens' Registered Park and Garden is located within the north western section of the LNP area and is wholly within the Lee Manor Conservation Area. Lee Forum are also keen to explore opportunities to designate additional conservation areas at Lee Green Town Centre, Lee High Road, Manor Park, and Cambridge Drive, in recognition of their positive contribution to the historic character and significance of the LNP area.

5.31 With reference to the proposed site allocations, the key heritage constraints and considerations are as follows:

- Land off Dacre Park, Adjacent to Allotments (Policy SA01): there is a grouping of locally listed buildings immediately to the west of the site, along Dacre Park and Boone Street.
- Land on Old Road, and Old Road Depot (Policy SA02 and Policy SA03): a grouping of five Grade II listed buildings and the Grade II* listed 'Lee Public Library' is located approximately 100m to the west of the two sites. Most of these buildings are within the Grade II listed 'Manor House Gardens' Registered Historic Park and Garden and the Lee Manor Conservation Area. The sites are also located immediately to the south of the proposed 'Lee High Road' Conservation Area.
- Garage Site on Burnt Ash Hill (Policy SA04): Lee Manor Conservation Area and two locally listed buildings are located to the east of the site, on the opposite side of Burnt Ash Hill.
- Site of Disused Garages on Wisteria Road (Policy SA05): Grade II listed 'Telephone Exchange' and 'K6 Telephone Kiosk Outside Telephone Exchange' are located immediately to the north of the site.
- Effingham Road (Policy SA06): the site is within the Lee Manor Conservation Area and is also located directly to the north west of four Grade II listed buildings along Burnt Ash Hill.
- Sainsbury's Site (Policy SA07): Grade II listed 'Police Station' is located at the north eastern corner of the site. The Lee Manor Conservation Area is adjacent to the western site boundary, and the northern half of the site is within the boundary of the proposed 'Lee District Town Centre' Conservation Area. The site is also located directly to the south east of the proposed 'Lee High Road' Conservation Area and a cluster of locally listed buildings.
- Site at 321-341 Lee High Road, SE12 8RU (Policy SA08): the site is within the boundary of the proposed 'Lee Green Town Centre' Conservation Area and is surrounded by a cluster of locally listed buildings. It is possible that the site itself comprises two locally listed buildings, but it is difficult to be certain due to the scale of the map presented in the LNP (also shown in the 'Historic Environment' section of Appendix A in this Environmental Report). The Grade II listed 'Police Station' is also located directly to the south of the site, along Lee High Road.
- Disused Lockup Garages off Burnt Ash Road (Policy SA09): there is a corridor of four Grade II listed buildings (residential property numbers 56,

58, 60, and 62 along Burnt Ash Hill) located approximately 100m to the south west of the site, and which are within the boundaries of the Lee Manor Conservation Area.

- Leegate Shopping Centre (Policy SA10): there are two Grade II listed buildings within proximity to site, including Lee Green Fire Station (directly to the north, on the opposite side of Eltham Road) and the Police Station (approximately 50m to the north west of the site, along Lee High Road). There is also a corridor of four Grade II listed buildings (residential property numbers 56, 58, 60, and 62 along Burnt Ash Hill) located approximately 100m to the south of the site, and which are within the Lee Manor Conservation Area. There are also several locally listed buildings surrounding the Lee Green Crossroads (i.e. the area directly at the north western site boundary). Furthermore, the site is approximately 150m to the east of Lee Manor Conservation Area, and adjacent to the proposed 'Lee Green Town Centre' Conservation Area.
- Corner of Millbank Way and Osberton Road (Policy SA11): the proposed 'Cambridge Drive' Conservation Area is located directly to the north east of the site, with two locally listed buildings within an approximate 50m distance from the site.
- Vehicle Hire Corner of Lee High Road and Manor Park (Policy SA12): located within an approximate 50m distance from four locally listed buildings located along Lee High Road, and within the boundary of the proposed 'Lee High Road' Conservation Area.

5.32 These sensitivities are reflected by LNP policies and proposals which have a strong focus on the conservation and enhancement of both designated and non-designated heritage assets, and their settings.

5.33 For example, Policy HD1 (Designation, Conservation and Enhancement of Heritage Assets) requires proposals to ensure that the design of future developments respect and utilise heritage assets and features so that they integrate sympathetically with the surrounding environment. Proposals shall also be required to justify any alterations or enhancements through the preparation of a heritage statement that is proportionate to the significance of the asset(s). Policy HD2 (Design and Scale of New Development) highlights that all new developments should positively contribute to local identity, including the application of innovative design and materials to create clearly legible historic reference points for future generations. The provisions of these policies are likely to provide opportunities for the LNP to positively contribute to the fabric and setting of heritage assets through incorporating high-quality design which reflects the historic character and special qualities of the LNP area.

5.34 Furthermore, new development within the LNP area shall be expected to be taken forward in conjunction with the provisions of the Design Guide prepared to support the LNP. Given the Design Guide sets out a comprehensive range of provisions relating to the historic environment, this will help provide an appropriate basis for the conservation and enhancement of the historic environment surrounding the proposed site allocations.

5.35 Historic environment sensitivities are further reflected by proposals which seek avoid loss of or damage to heritage features, incorporate heritage features into

new development areas, and provide opportunities for enhancing their fabric and setting. Specifically, Policy HD1 and Policy HD3 (Extensions, Alterations and New Buildings) outlines that proposals should ensure the retention and management of historic features, provide elements of characterisation in the design of schemes, and facilitate heritage-led regeneration which (amongst other considerations) complements the form, setting, period, architectural characteristics, and detail of the original and surrounding buildings and context. It is anticipated that the policy provisions will positively respond to the role that local distinctiveness and heritage assets have in creating a sense of place within the LNP area. Additionally, policies which support the principle of walkable neighbourhoods and healthy streets (including Policy TC3 and Policy RLE3) has the potential to facilitate pedestrian accessibility to heritage assets and areas, which in turn can enhance the understanding and appreciation of their special qualities.

- 5.36 The LNP also has a strong focus on improving the vitality and integrity of Lee District Town Centre and the local hubs within the LNP area. For example, Policy RLE1 (Maintain, Improve and Sustain the Diversity, Vitality and Viability of Retail Sites) supports proposals to increase the range of retail, employment, socio-cultural and leisure uses providing that they respect and protect the character and heritage of the surrounding environment. Policy RLE5 encourages proposals which promote the vitality of Lee Green District Town Centre providing that, amongst other considerations, a coordinated approach is taken to its regeneration which appropriately considers and respects the historic sensitivities and heritage significance of the town centre environment. Policy RLE5 also stipulates that proposals should integrate with existing buildings of historic merit in line with Historic England's guidance and advice. This will help rejuvenate areas with historic interest.
- 5.37 More broadly, delivering net gains in biodiversity and facilitating green and blue infrastructure enhancements can have beneficial impacts in terms of the built environment, and by extension, the setting of the historic environment. Key policies in this regard include Policy GB1 – 4, which are discussed in more detail within the 'Biodiversity and Geodiversity' and 'Landscape and Townscape' appraisals, above. In addition to supporting enhancements to the setting of features and areas of historic environment interest, it has the potential to support and strengthen the character of the built environment.

Community Wellbeing

- 5.38 In terms of the delivery of new housing and employment provision within the LNP area, the sites currently being taken forward by the Forum as Neighbourhood Plan allocations are either those which have been allocated through the emerging New Lewisham Local Plan (2020-2040) or comprise smaller brownfield sites. Further information regarding the site selection process is presented in Chapter 4 of this Environmental Report (specifically paragraphs 4.6 to 4.11). These sites mirror the proposals set out in the Local Plan and reflect in planning policy terms both the provisions of the New Lewisham Local Plan and the London Plan (2021). To further encourage the regeneration of underutilised sites within the LNP area, Policy BHA5 (Windfall Sites) also outlines support for proposals which bring such sites back into active uses. This may include through residential, micro-employment or mixed-

use developments, providing that (as stated in Policy BHA5) the design makes sufficient and sensitive use of the land with minimal impacts on amenity.

- 5.39 The quality of development is a key influence on the quality of life of residents. Along with the Design Code which accompanies the submission version of the LNP, Policies SA01 - SA12 within the LNP also provide criteria and guidance for each of the site allocations with a view to implementing high quality design and layout within new development areas. The provisions primarily focus on ensuring that appropriate mitigation measures are incorporated to address any potential constraints to development, in addition to ensuring that new development is safe, attractive, inclusive, and accessible, and does not cause unnecessary noise and light pollution. Additionally, Policy BHA4 (Housing Delivery) aims to ensure that larger development sites (i.e. those which will deliver at least ten dwellings) provide a range of housing sizes and tenures to meet local housing needs. Policy HD2 (Design and Scale of New Development) also states that that developments should be designated to Lifetime Home Standards, allowing for long term occupancy of properties which can be readily adaptable for changing circumstances. In this respect the LNP will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents.
- 5.40 The quality of housing will also be supported by Policy BHA6 (Design of New Development) which sets out several provisions which seek to support energy efficient and low carbon development. This will help to address issues such as fuel poverty, which is important in the current economic climate given the rising costs of living. The quality of the living environment will also be supported by policies which encourage the delivery of adequate and well-located public realm facilities at an appropriate size and type (see Policy BHA3 'Enhancement of Public Realm Facilities), in addition to linking sites, aiding connectivity, and delivering including design to facilitate mobility and accessibility for all (see Policy RLE3 'Improve and Enhance the Public Realm of Retail / Cultural Activity Sites). Furthermore, Policy BHA3 and Policy BHA6 highlight that the design and layout of development sites should (amongst other considerations) meet streetscape design standards, be accompanied by a health impact assessment (for larger sites) to ensure that health and wellbeing issues are appropriately considered during the planning process, and provide appropriate waste and water management facilities.
- 5.41 A key aspect of the LNP is to ensure that the provision of community facilities continues to reflect the needs of a changing and increasingly diverse population, and that these facilities are accessible to all. LNP policies are therefore consistent with the NPPF (paragraph 93), which encourages planning policies and decisions to *“plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities”* and *“ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”* Key LNP policies in this respect include Policy BHA1 (Protection, Enhancement and Provision of Community Buildings) and Policy BHA2 (Protection, Enhancement and Provision of Social Infrastructure).

- 5.42 Over recent years, a move to out of town retail and internet spending has challenged the dominance of shopping as a focus of activity in local and district centre environments. The economic shocks following the COVID-19 pandemic are likely to accelerate these trends. Nevertheless, the LNP has a strong focus on improving the vitality and integrity of the area's local and district centres. For example, Policy RLE1 (Maintain, Improve and Sustain the Diversity, Vitality and Viability of Retail Sites) supports proposals to increase the range of retail, employment, socio-cultural and leisure uses within the LNP area. Proposals that would result in the loss of existing services will be resisted. Policy RLE4 (Protect and Encourage Local Employment Sites) seeks to preclude the loss of existing employment land, and supports new business, commercial, and employment development subject to the criteria listed within the policy. Furthermore, Policy RLE5 encourages an integrated and master planning approach to future development within Lee Green District Town Centre to promote the vitality of this important local hub with a mix of uses (including culture and leisure opportunities). In this respect, these policies will promote the economic vitality of the LNP area, protect the role and function of local and district centres, and support employment opportunities.
- 5.43 Overarching principles for the LNP also include supporting healthy and active lifestyles, ensuring that the community is a safer and more enjoyable place to live, and providing equal opportunities for everyone. In this context, policies within the LNP set out a range of provisions which will support and enhance residents' quality of life. Specifically, Policy TC2 (Improve Measures to Reduce Pollution Levels) aims to improve road safety for everyone in the LNP area, via reducing the barriers to walking and cycling and ensuring developments provide safe and secure routes. Policy GB3 (Designation of Nature Improvement Areas: River Quaggy Trail and Hither Green Nature Trail) emphasises the importance of managing and investing in the LNP area's rights of way network to ensure that these assets remain open and are well maintained and safe. This includes through the River Quaggy Trail project which seeks to unlock opportunities to connect sections of the river and link to the wider network of SINCS. The provisions of these policies will positively support and encourage healthier and active lifestyles.
- 5.44 Travel patterns are changing, with an increase in online shops and services and more people, especially office workers, now working from home; a change which is being accelerated in response to the COVID-19 pandemic. Combined with improvements to broadband connectivity, this is likely to mean that more people can work or run a business at home but will potentially still need to make frequent journeys for day to day needs. Therefore, measures to help increase sustainability, connectivity, accessibility and reduce the need to travel are also important considerations for the LNP. Key policies in this regard include Policies TC1 - 3 (and are considered in further detail within the 'Transportation appraisal, below).
- 5.45 More broadly, LNP policies and proposals will bring a range of further benefits for community wellbeing, particularly through facilitating and delivering public realm improvements (including through green and blue infrastructure provision). Green and blue infrastructure provides space for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing,

through encouraging healthy outdoor recreation and relaxation²⁶. Key policies in this respect include Policy GB1 (Protection and Enhancement of Green Spaces), Policy GB2 (Achieving a Green Infrastructure-led Development), and Policy GB6 (Protection and Enhancement of Lee's Playing Fields). This will support physical and mental health and wellbeing of the local community.

Transportation

- 5.46 The impact of the COVID-19 pandemic means that the future baseline of travel demand is likely to be different for all residents. In the longer term it is hard to predict how behaviours will evolve and whether some of the travel responses observed in lockdown will be maintained in some form. However, reflecting the results of the National Travel Attitudes Study, 94% of respondents thought it likely that they would continue to rely on active travel methods (walking and cycling) once travel restrictions were removed²⁷.
- 5.47 Regarding connectivity and accessibility within the LNP area, policies and proposals seek to maximise the ability for residents to make trips by public, sustainable, and active modes of transport. Key policies in this regard include Policy TC1 (Protect, Promote and Enhance Public Transport), Policy TC3 (Improve and Encourage Active Travel Options and Road Safety Measures in the Forum Area), and Policy RLE5 (Revitalise Lee Green District Town Centre). This includes through prioritising and safeguarding walking, cycling, and public transport in line with the modal hierarchy for transport users, delivering more active travel infrastructure, providing healthy streets and low-traffic neighbourhoods, and providing a more reliable and resilient public transport network in terms of service numbers, frequencies and journey times. The policies positively contribute to the Mayor of London's strategic target of 80% of journeys within London to be made by walking, cycling or public transport by 2041. Furthermore, the recommended further actions listed within the LNP encourages a collaborative and proactive approach to delivering transport services and infrastructure within the LNP area. These policies should help to galvanise local communities with opportunities to be involved in the development of more sustainable transport solutions.
- 5.48 The dominance of vehicles on streets is also a significant barrier to walking and cycling, often reducing the appeal of streets as public places. In this regard, Policy TC2 (Improve Measures to Reduce Pollution Levels) seeks to discourage travel via car by adopting measures such as reduced parking provision, limiting on-street parking, and maximising the potential for active travel by reducing barriers to walking and cycling through safe and inclusive design. This should support the creation of mixed and vibrant places that are designed for people rather than vehicles, and positively contribute to the London Plan's 'Vision Zero' approach by reducing road dangers for everyone.
- 5.49 Overall, LNP policies are likely to improve and enhance the active travel network, including public rights of way and cycle routes, and further encourage

²⁶ Natural England (2021): 'Green Infrastructure Network Framework' [online] available to access via: <https://naturalengland.blog.gov.uk/2021/12/07/how-natural-englands-green-infrastructure-framework-can-help-create-better-places-to-live/>

²⁷ Department for Transport (2020): 'National Travel Attitudes Study: Wave 4 (Provisional)': [online] available to access via: <https://www.gov.uk/government/statistics/national-travel-attitudes-study-wave-4-provisional>

the use of sustainable modes of transport in the medium-to-long-term. This is likely to create positive effects in relation to the Transportation SEA Theme.

Conclusions at this current stage

- 5.50 The assessment has concluded that the submission version of the LNP is likely to have significant positive effects in relation to the 'Community Wellbeing' SEA Theme through delivering suitable and appropriate housing for the local community (via a range of types and tenures), improving accessibility to services, facilities and amenities, supporting the viability of Lee District Town Centre, facilitating improvements to the public realm (including through green and blue infrastructure enhancements), and encouraging healthier and active lifestyles. This will support social inclusion, the quality of life of residents, and community vitality.
- 5.51 The LNP will also bring positive effects in relation to the Landscape and Townscape SEA Theme. These benefits largely relate to the LNP's emphasis on protecting and enhancing landscape and townscape character, delivering high-quality design which respects and enhances local distinctiveness and sense of place, protecting important townscape features, and facilitating improvements to quality of the public realm.
- 5.52 In relation to the Historic Environment SEA Theme, the LNP includes several measures which seek to conserve and enhance both designated and non-designated heritage assets (and their settings). This includes through encouraging high-quality design which is informed by proportionate heritage assessments, increasing awareness, understanding and appreciation of the historic environment, and encouraging additional designations (including four proposed conservation area designations and locally important buildings) to appropriately safeguard and protect the historic environment. Given the Design Guide accompanying the LNP also sets out a comprehensive range of provisions relating to the historic environment, this will help provide an appropriate basis for the conservation and enhancement of the heritage assets and features surrounding the proposed site allocations.
- 5.53 Additionally, the LNP will bring positive effects in relation to the Biodiversity and Geodiversity SEA Theme by supporting net gains for biodiversity within new development proposals, enhancing ecological networks through green and blue infrastructure enhancements (including through the designation of nature improvement areas at Hither Green and the River Quaggy), and improving ecological resilience. Nonetheless, **the SEA recommends** that developers also consider utilising the Government's latest available biodiversity metric tools (e.g. at the current time, the latest version is v3.0, which was published by Natural England and Defra in July 2021). This includes a specific metric for smaller development sites (which is likely to be appropriate for the eight smaller brownfield sites proposed through the LNP) and an 'environmental benefits from nature tool' which aims to maximise the benefits from delivering net gains.
- 5.54 Regarding the Climate Change SEA Theme, the LNP will potentially lead to positive effects through supporting proposals which deliver energy efficient designs and layouts, proactively respond to the potential impacts of climate change (i.e. the urban heat island effect, and flood risk concerns from increased storms / rainfall events), and by encouraging active and sustainable travel within the LNP area. However, this is dependent on the extent to which

development proposals incorporate these mitigation and adaptation measures through design.

5.55 The LNP will also initiate several beneficial approaches regarding the 'Air Quality' and 'Transportation' SEA Themes, given its focus on enhancing the active travel network (including public rights of way and cycle routes), supporting healthy streets and low-traffic neighbourhoods, and encouraging a greater use of sustainable modes of transportation in the medium-to-long-term in order to positively contribute to the London Plan's 'Vision Zero' approach.

6. What are the next steps?

- 6.1 The SEA Environmental Report accompanies the submission version of the LNP to the responsible authority, Lewisham Council, for Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.3 If the Independent Examination is favourable, the LNP will be subject to a referendum, organised by Lewisham Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the LNP will become part of the development plan for the LNP area.

Appendix A Context Review and Baseline

A.1 Air Quality

Policy Context

Table A1.1 below presents the most relevant documents identified in the policy review for the purposes of the LNP.

Table A1.1: Plans, policies, and strategies reviewed in relation to air quality

Document title	Year of publication
National Planning Policy Framework (NPPF)	2019
The Clean Air Strategy	2019
UK plan for tackling roadside nitrogen dioxide concentrations	2017
A Green Future: Our 25 Year Plan to Improve the Environment	2018
The London Plan 2021	2021
Lewisham Air Quality Action Plan (2016-2021)	2016
Lewisham Local Plan: Core Strategy (2011-2026)	2011
Lewisham Site Allocations Local Plan (2011-2026)	2013
Lewisham Local Plan (2020-2040)	Emerging Local Plan
Royal Greenwich Local Plan (2013-2028)	2014

The key messages emerging from the review are summarised below:

- The LNP will be required to be in general conformity with the NPPF, which predominantly seeks early planning to reduce/ mitigate air quality impacts in development and to take advantage of opportunities to improve air quality. Measures to improve air quality include traffic and travel management and green infrastructure provision. Strategic development is expected to be focused in locations that have or will be provided with high levels of accessibility; supporting both a reduced need to travel and offering a genuine choice of transport modes. Smaller-scale development should consider the potential for cumulative effects in relation to air quality.
- To improve air quality across the UK, national strategies have, in the last few decades, focused on regulatory frameworks, investment by industry in cleaner processes and a shift in the fuel mix towards cleaner forms of energy (largely at point sources). Whilst there are dedicated strategies to reducing roadside emissions (as a significant source of nitrogen dioxide emissions), recent objectives outlined in the Clean Air Strategy seek to recognise wider sources (including smaller contributors and diffuse sources) that contribute to poor air quality. These include power generation, heating homes, producing food, manufacturing consumer goods, and powering transport.

- The LNP will also be required to be in general conformity with the adopted Local Plan which contains policies relating to air quality, alongside the policies of the emerging Local Plan.
- Air Quality Management Areas (AQMAs) are declared in areas which exceed national objectives for levels of particulates, nitrogen dioxide, sulphur dioxide, ozone, benzene, polycyclic aromatic hydrocarbons, butadiene, carbon monoxide, lead and/ or nitrogen oxides. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.
- Lewisham's Air Quality Action Plan (AQAP) 2016-2021 has identified measures to improve air quality and improve the lives of those living within AQMAs as well as the wider population.

Current Baseline

The whole of the Neighbourhood Plan area is located within the Lewisham AQMA²⁸, which was designated in July 2001 primarily for exceedances in the annual mean concentration objective of $40 \mu\text{g m}^{-3}$ for nitrogen dioxide (NO_2) and 24-hourly mean concentrations for particulate matter (PM_{10}).

The 2021 Air Quality Annual Status Report (ASR)²⁹ for Lewisham contains the following key conclusions:

- In 2020, the annual mean NO_2 and PM_{10} concentrations at automatic monitoring sites overall exhibited a continuation of the decreasing trend observed over the seven-year period between 2014 to 2020.
- Regarding monitoring by passive diffusion tubes, there were no diffusion tube locations which exceeded the annual mean NO_2 objective during 2020. On average, the decrease between 2014 and 2020 at diffusion tube sites was 39% for the seven-year period.
- In 2020, diffusion monitoring location LW4³⁰ observed eight instances where the 24-hourly mean for PM_{10} was greater than the objective value of $50 \mu\text{g m}^{-3}$. However, this is lower than the number of exceedances recorded in 2019 at this location.

The ASR goes on to state that the Borough supports the Mayor's commitment to meet the World Health Organisation guidelines for $\text{PM}_{2.5}$ which is more ambitious than the goal in the new national Clean Air Strategy. Currently $\text{PM}_{2.5}$ limit levels in UK are working towards the EU limits which is $25 \mu\text{g m}^{-3}$. The World Health Organisation has introduced a target $10 \mu\text{g m}^{-3}$ as an annual mean concentration. Unlike other pollutants, such as NO_2 , the ASR recognises that a large percentage of $\text{PM}_{2.5}$ in London comes from regional, and often transboundary (non-UK) sources. Therefore, the powers to tackle these emissions lie elsewhere within London, the UK and with other European governments, which can make it more difficult to address with direct measures.

²⁸ UK Air Information Resource (2021): 'Lewisham AQMA', [online] available to access via [this link](#)

²⁹ Lewisham Council (2021): 'Air Quality Annual Status Report', [online] available to access via [this link](#)

³⁰ The nearest monitoring location to the Neighbourhood Plan area which measures PM_{10} , located approximately 1.5 km to the north west (along the A20).

With reference to the impact of the pandemic on air quality, a detailed analysis of the impact of Covid-19 on air pollutant concentrations was undertaken as part of the Lewisham and Lee Green Low Traffic Neighbourhood (LTN)³¹. The assessment shows a general decrease in concentration of NO₂ across Lewisham during 2020 due to reductions in movement because of lockdowns.

However, the LTN highlight that Covid-19 has led to a reduction in capacity on public transport. Many people still wary of using buses and trains which has meant there are more vehicles than expected on the main roads around the LTN. Having observed the increasing traffic levels and increased bus journey times, the LTN suggest that short-term changes are needed to ease traffic congestion on key junctions such as Hither Green Lane and the South Circular (A205).

The Neighbourhood Forum highlight that traffic passing through the Lee District Town Centre uses the historic streets and this undermines the environmental quality and exacerbates air pollution issues. This also includes heavy goods vehicles passing through town centre which detract from the environment and increase air pollution issues.

Future Baseline

New housing and employment provision taken forward within the LNP area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants. Improvements to future air quality are dependent, in part, on whether the measures within the AQAP and the Mayor's Transport Strategy (later discussed in the 'Transportation' chapter of this SEA Scoping Report) are successfully implemented.

³¹ Lewisham Council (2021): 'Lewisham and Lee Green Low Traffic Neighbourhood', [online] available to access via [this link](#)

A.2 Biodiversity and Geodiversity

Policy Context

Table A2.1 below presents the most relevant documents identified in the policy review for the purposes of the LNP.

Table A2.1: Plans, policies, and strategies reviewed in relation to biodiversity and geodiversity

Document title	Year of publication
National Planning Policy Framework (NPPF)	2019
The 25 Year Environment Plan	2018
Biodiversity 2020 Strategy	2011
Environment Act	2021
UK Biodiversity Action Plan	2007
The Natural Environment and Rural Communities Act	2006
The London Plan 2021	2021
Lewisham Local Plan: Core Strategy (2011-2026)	2011
Lewisham Site Allocations Local Plan (2011-2026)	2013
Lewisham Local Plan (2020-2040)	Emerging Local Plan
Royal Greenwich Local Plan (2013-2028)	2014

The key messages emerging from the review are summarised below:

- The LNP will be required to be in general conformity with the NPPF, which provides significant emphasis on improving biodiversity and securing measurable net gains in development, alongside protection and conservation of designated sites and important species and habitats. This includes utilising a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale. Support is given to establishing coherent ecological networks that are more resilient to current and future pressures, particularly in consideration of climate change.
- Over the past decade policy (e.g. The Natural Environment White Paper and Biodiversity 2020) has demonstrated a move away from the traditional approach of protecting biodiversity, to a wider landscape approach to enhancing biodiversity, as part of the overall aims to halt biodiversity loss.
- The 25 Year Environment Plan places emphasis on improvements to the natural environment; identifying the need to *“replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats.”* Working at a landscape scale transformation is expected to connect habitats into larger corridors for wildlife.
- The Environment Act (2021) provides further provisions in relation to biodiversity since receiving Royal Assent in November 2021. The Act sets

parameters for biodiversity gain as a condition of planning permission, as well as biodiversity gain site registers and biodiversity credits. The Act identifies a general duty to conserve and enhance biodiversity, including through biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Furthermore, habitat maps are expected to include recovery and enhancement areas which are or could become of importance for biodiversity.

- The LNP will also be required to be in general conformity with the adopted Local Plan which contains policies directly relating to biodiversity and geodiversity, and emerging policies in the emerging Local Plan.

Current Baseline

International and nationally designated sites

There are no internationally designated sites within the Neighbourhood Plan area. The nearest internationally designated sites are approximately 15km to the west of the Neighbourhood Plan area, specifically: Wimbledon Common Special Area of Conservation (SAC), and Richmond Park SAC.

Sites of Special Scientific Interest (SSSI) are protected by law to conserve their wildlife or geology. Natural England is a statutory consultee on development proposals that might impact on SSSIs. There are no SSSIs located within or adjacent to the boundaries of the Neighbourhood Plan area.

In the wider context, there are three SSSIs located within a 5km radius from the Neighbourhood Plan area, including: Gilbert's Pit (Charlton) SSSI (to the north); Oxleas Woodlands SSSI (to the east); and Elmstead Pit SSSI (to the south).

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential, and rural non-residential.

Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this respect, the LNP area does not overlap with SSSI IRZs for the types of development which are likely to be brought forward during the plan period.

Locally important sites

Located immediately to the east of the Neighbourhood Plan area, Sutcliffe Park Local Nature Reserve (LNR) was designated in August 2006 and covers an area of approximately 5.9 ha. The citation for the LNR states:

"This large, tree-lined park in the western part of Eltham comprises areas of open grassland, meadow, and wetland. The river Quaggy meanders through the site. Species: dragonflies, damselflies, kingfisher, snipe, and reed warbler."

In the wider context, there are two additional LNRs within an approximate 1km radius surrounding the Neighbourhood Plan area, as follows: Burnt Ash Road LNR (to the south); and Grove Park LNR (to the south).

Sites of Importance for Nature Conservation represent some of the most significant areas of semi-natural habitat across London outside of statutory protected sites.

Completed in 2016, the SINC Survey³² identifies the following SINC as being located within the Neighbourhood Plan area (with the summaries taken from the citation document which accompanies the SINC Survey):

LeB17: River Quaggy at Manor House Gardens

The River Quaggy flows through the south of the park along a gently meandering course over a clean, gravelly bed, shaded by arching trees and shrubs and creating a relatively undisturbed habitat corridor. The tree canopy is dominated by non-native species including sycamore (*Acer pseudoplatanus*), Norway maple (*Acer platanoides*) with silver birch (*Betula pendula*), common alder (*Alnus glutinosa*) and hawthorn (*Crateagus monogyna*). The shaded conditions limit aquatic and marginal vegetation to mainly pendulous sedge (*Carex pendula*).

The recently restored lake occupies the central region of the park and is probably the best site for breeding waterfowl in Lewisham Borough. Species which nest on the wooded island include coot, moorhen, Canada goose, mallard, and tufted duck. It is the only site in Lewisham where the latter species regularly breeds. The lake is also an important feeding ground for bats (one of the best along the River Quaggy); both common and soprano pipistrelles have been recorded. The abundance of mature trees, dense planted shrubbery and herbaceous planting are of value to a range of common but declining invertebrates and birds such as house sparrow, a flagship species in Lewisham Borough.

LeB28: Hither Green Railsides (Hither Green Station)

Lewisham's railsides comprise an extensive series of relatively undisturbed wildlife habitats and a vital network of green corridors. The key railside habitats include rough grassland, tall herbs, scrub, scattered trees, and woodland, which occur together in various combinations to form a very large linear patchwork. Extending throughout the borough, the rail network provides feeding and breeding sites, shelter and means of dispersal for many species of plants, bird, mammals, reptiles, and insects.

The triangular area itself is managed as a nature reserve and located between (and visible from) platforms 4 and 5. There is a small stream which flows north to south across the east of the site and forms a small pond surrounded by dense scrub. The impenetrability of the scrub is good for birds and a reasonable number of common species familiar in parks and gardens live here including foxes.

LeB29: Hither Green Sidings

This is an area of former railway sidings and abandoned allotments, which have become overgrown with a dense growth of scrub, scattered trees, rough land, and native broadleaved woodland. A large part of the site is in-accessible, making it particularly valuable for birds. The central area is currently being used as a horse stable yard with small clearings used as horse pasture and showing signs of overgrazing with a short sward and bare ground.

There is a small pond from which common newt, frog and toad have all been recorded. This is enclosed by wetland plants including fool's watercress (*Apium nodiflorum*), pendulous sedge (*Carex pendula*), reed sweet grass (*Glyceria maxima*),

³² Lewisham Council (2016): 'SINC Survey', [online] available to access via [this link](#)

and flag iris (*Iris pseudacorus*). There is also a wet ditch that runs northwards with similar plant species occurring along it.

LeB37: River Quaggy and Manor Park

This park contains a section of the River Quaggy (circa 385m) and has been renovated in an ecologically sensitive manner as part of a wider flood management scheme between Sutcliffe Park and Lewisham town centre. Along with improving access down to the river, new planting and grassland management has created a park which is rich in biodiversity given its urban location. The river forms the park's western boundary and for most of its length is bordered by mature non-native woodland, providing a relatively undisturbed habitat for kingfisher, a Lewisham Borough flagship species.

Priority habitats and species

There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, predominantly areas of deciduous woodland, traditional orchard, and wood pasture and parkland.

The Greenspace Information for Greater London (GiGL)³³ contains records of protected or notable species within the Neighbourhood Plan area. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the BAP Priority Habitats and ecological designations within and surrounding the Neighbourhood Plan area are likely to support populations of protected species.

The figures overleaf show the location of the designated sites and BAP Priority Habitats within and within proximity to the Neighbourhood Plan area.

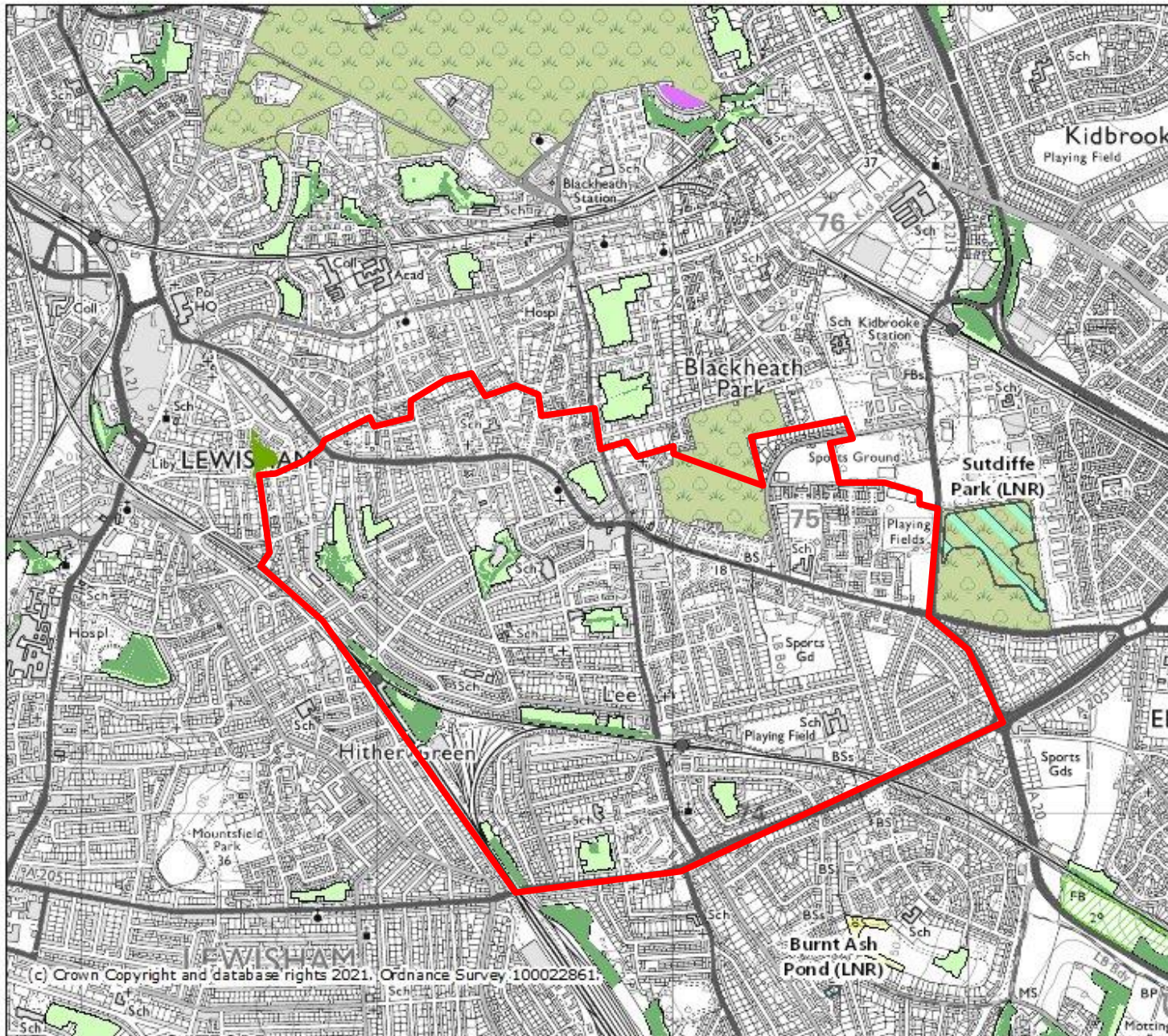
Future Baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.








The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment, and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the Neighbourhood Plan area and in the surrounding areas.

³³ GiGL (2021): 'About GiGL', [online] available to access via [this link](#)

MAGiC Biodiversity Designations & Priority Habitats



Legend

-  Local Nature Reserves (England)
-  Priority Habitat Inventory - Good quality semi-improved grassland (Non Priority) (England)
- Ancient Woodland (England)**
 -  Ancient and Semi-Natural Woodland
 -  Ancient Replanted Woodland
- Priority Habitat Inventory - Deciduous Woodland (England)**
- National Forest Inventory (GB)**
 -  Assumed woodland
 -  Broad leaved
- Priority Habitat Inventory - Traditional Orchards (England)**
-  Woodpasture and Parkland BAP Priority Habitat (England)

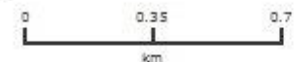
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ymin = 173400

xmax = 543100

ymax = 176600



Map produced by MAGiC on 14 September, 2021.

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A.3 Climate Change

Policy Context

Table A3.1 below presents the most relevant documents identified in the policy review for the purposes of the LNP.

Table A3.1: Plans, policies, and strategies reviewed in relation to climate change

Document title	Year of publication
National Planning Policy Framework (NPPF)	2019
UK Climate Change Act	2008
UK (second) National Adaptation Programme 2018 to 2023	2018
The Clean Air Strategy	2019
Clean Growth Strategy	2019
UK Sixth Carbon Budget	2020
25-Year Environment Plan	2019
National Infrastructure Assessment	2018
UK Climate Change Risk Assessment	2017
Flood and Water Management Act	2010
National Flood and Coastal Erosion Risk Management Strategy	2020
How Local Authorities Can Reduce Emissions and Manage Climate Change Risk	2012
The National Design Guide	2021
Heat Networks: Building a Market Framework	2020
Summary of Climate Change Risks for England Report	2017
Interim Climate Change Planning Policy	2021
Lewisham Strategic Flood Risk Assessment Guidance Document	2020
Lewisham's Energy Masterplan	2020
Lewisham Climate Emergency Strategic Action Plan (2020-2030)	2020
The London Plan 2021	2021
Lewisham Local Plan: Core Strategy (2011-2026)	2011
Lewisham Site Allocations Local Plan (2011-2026)	2013
Lewisham Local Plan (2020-2040)	Emerging Local Plan
Royal Greenwich Local Plan (2013-2028)	2014

The key messages emerging from the review are summarised below:

- The LNP will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that

contribute to radical reductions in greenhouse gas emissions, and deliver long-term resilience, including through reuse, regeneration, and conversion.

- The Clean Growth Strategy, Clean Air Strategy and the 25-year Environment Plan are a suite of documents which seek to progress the government's commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25-year Environment Plan, which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents also interlink with the government's commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK's National Adaptation Programme.
- The LNP will also be required to be in general conformity with the adopted local plan which contains policies relating to climate change mitigation and adaptation, including flood risk, green infrastructure (GI) development, resource efficiency, air quality, water quality, sustainable transport, and accessibility. The LNP will also need to acknowledge the emerging policies in the emerging local plan.

Current Baseline

Contribution to climate change

In June 2019 the government committed to reaching 'net zero' carbon emissions by 2050. Both Lewisham³⁴ and the RB of Greenwich³⁵ declared a climate emergency that same year.

CO₂ emissions from the built environment are monitored and recorded at Local Authority level. In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change³⁶ suggests that Lewisham and the RB of Greenwich has lower per capita emissions in comparison to London and England as a whole, since 2005. Lewisham has also seen a 47.8% reduction and the RB of Greenwich a 50.9% reduction in the percentage of total emissions per capita between 2005 and 2019. This is slightly lower and slightly higher respectively than the reductions for the London (48.4%) but higher than the reduction for England (37.6%).

Road transport is the largest emitter of GHG in the UK, with cars contributing 55% of UK domestic transport emissions. The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions.

³⁴ Lewisham Council (2019) [online] available from: [Lewisham Council - Making Lewisham carbon neutral by 2030: our climate emergency declaration](#)

³⁵ RB of Greenwich (2019) [online] available from: [Our declaration | What is the climate emergency? | Royal Borough of Greenwich \(royalgreenwich.gov.uk\)](#)

³⁶ UK Gov (2017): 'Local Authority CO₂ emissions estimates 2005-2017 (kt CO₂) - Full dataset' [online] available from [this link](#)

In line with assumptions made by the Department for Transport's 'Road to Zero Strategy' Report³⁷, it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030. Based on a high-level search using Google Maps, there are six ULEV charging points in the LNP area, shown in **Figure A3.1** below.

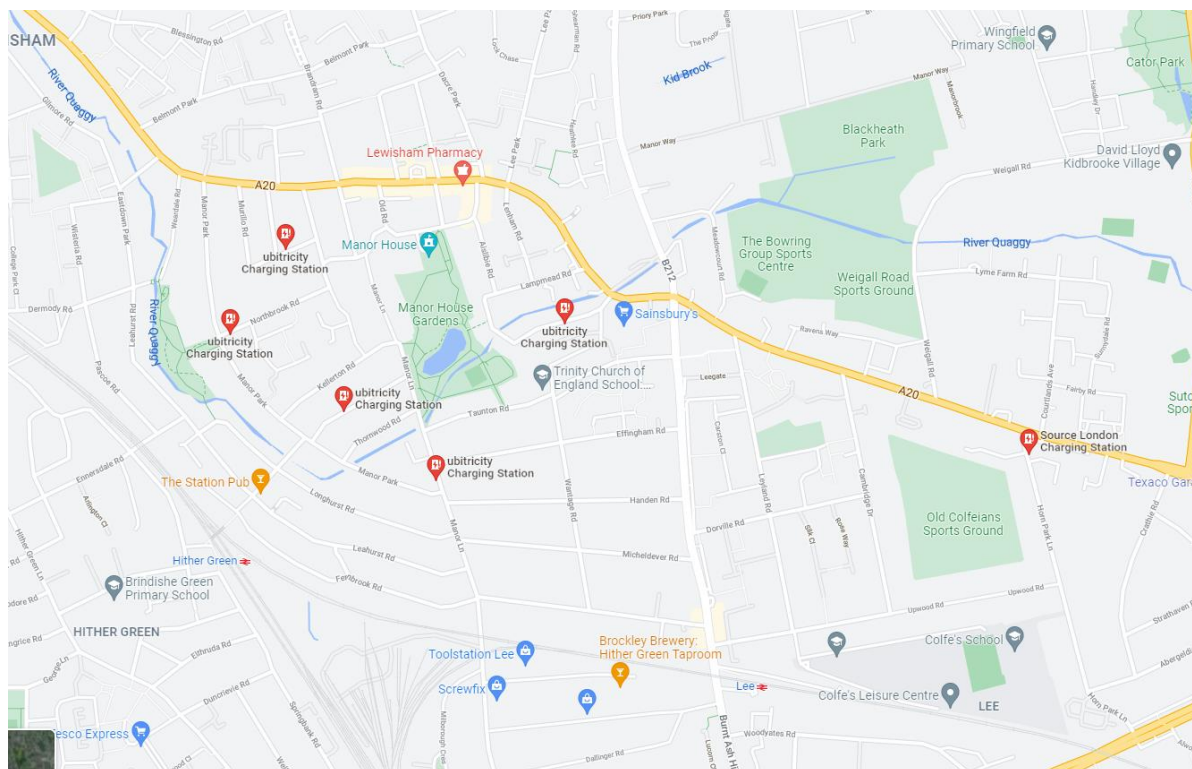


Figure A3.1: ULEV charging point locations within the LNP area

Effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)³⁸ team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile and RCP6) for the London during the period 2020-2039 compared to the period 1981-2000 are likely to be as follows:³⁹

- A central estimate of increase in annual mean temperatures of between 0°C and 1°C; and
- A central estimate of change in mean precipitation of 0 to +10% in winter and 0 to -10% in summer.

During the period 2040-2059 this is estimated further as:

³⁷ GOV.UK (2018): 'Reducing emissions from road transport: Road to Zero Strategy', [online] available to access via [this link](#)

³⁸ Data released 26th November 2018 [online] available from [this link](#)

³⁹ Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available at [this link](#)

- A central estimate of increase in annual mean temperatures of between 1°C and 2°C; and
- A central estimate of change in annual mean precipitation of 0 to +10% in winter and -10% to -20% in summer.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Effects on water resources from climate change.
- Reduction in availability of groundwater for extraction.
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain.
- Increased risk of flooding, including vulnerability to 1:100-year floods.
- A need to increase the capacity of wastewater treatment plants and sewers.
- A need to upgrade flood defences.
- Soil erosion due to flash flooding.
- Loss of species that are at the edge of their southerly distribution.
- Spread of species at the northern edge of their distribution.
- Increased demand for air-conditioning.
- Increased drought and flood related problems.
- Risk of road surfaces melting more frequently due to increased temperature.
- Flooding of roads.

Flood risks

The LNP area is at risk from several types of flooding, including fluvial, surface water, groundwater, sewage, and drainage.

The Lewisham Local Flood Risk Management Strategy⁴⁰ states that the main reasons for flooding in the neighbourhood plan area are as follows:

- *'Climate change (increased storminess / rainfall intensity);*
- *Urban creep (infill development and loss of green space);*
- *Ageing infrastructure (increased pressure on drainage systems and other infrastructure designed for different levels and patterns of use and in deteriorating condition; and*
- *Population growth (denser populations mean the impact of a flood for a given area will impact upon more people).'*

As shown on the Environment Agency's flood map for planning, the areas within Flood Zone 2 and Flood Zone 3 within the LNP area primarily cover those areas within proximity to the River Quaggy – the main watercourse. The areas at greatest risk (as shown in **Figure A3.2** below) includes areas of the town centre, Manor House Park and Garden, and residential properties along and surrounding the A20,

⁴⁰ Lewisham Council (2015): 'Lewisham Local Flood Risk Management Strategy', [online] available to access via: [Lewisham Council - Organisations responsible for flood risk management](#)

Manor Lane, Brightfield Road, Taunton Road, Southbrook Road, and Longhurst Road. The Bowring Group Sports Centre, Weigall Road Sports Ground (and surrounding fields) act as Flood Storage area with the western perimeter a flood defence.

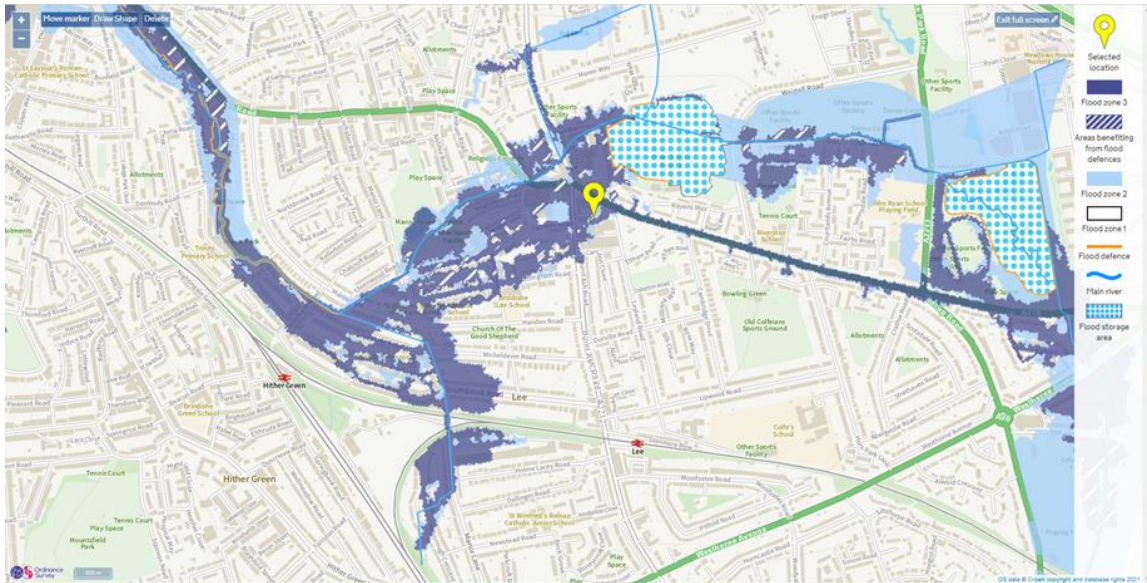


Figure A3.2: Fluvial flood risk in the Neighbourhood Plan Area⁴¹

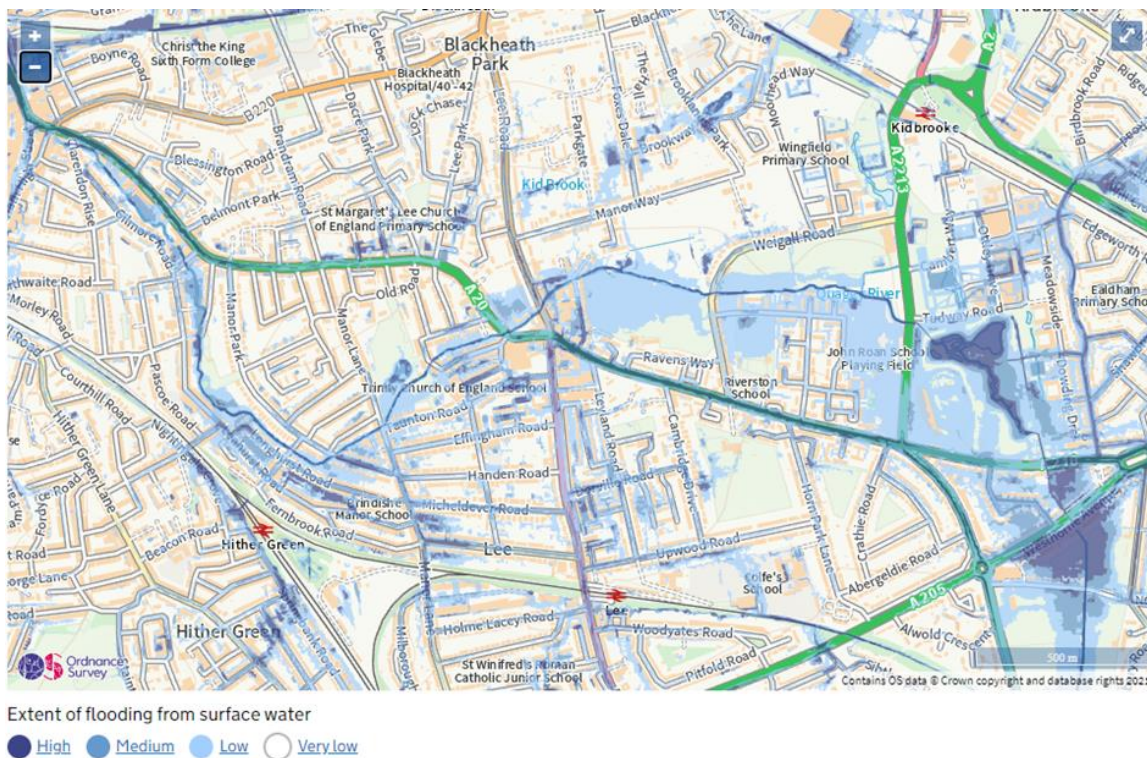


Figure A3.3: surface water flood risk within the Neighbourhood Plan Area⁴²

The Lewisham Local Flood Risk Management Strategy goes on to state that ‘about 3,700 properties remain at a moderate to significant risk of fluvial and tidal flooding within the Borough’.

⁴¹ GOV UK (2020): ‘Flood Map for Planning’, [online] available to access via [this link](#)

⁴² GOV UK (2020): ‘Flood Map for Planning’, [online] available to access via [this link](#)

Figure A3.3 above shows surface water flooding in the LNP area. There are several areas which have a medium or high surface water flood risk, which, during high rainfall events, can negatively impact residential properties and interrupt local public transport networks.

The Lewisham Local Flood Risk Management Strategy⁴³ also states that ‘around 11,000 properties are at risk of surface water flooding in a 1 in 30-year event’. Climate change and more extreme weather situations could increase the risk of flooding in the future.

Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

⁴³ Lewisham Council (2015): ‘Lewisham Local Flood Risk Management Strategy’, [online] available to access via: [Lewisham Council - Organisations responsible for flood risk management](#)

A.4 Landscape and Townscape

Policy Context

Table A4.1 below presents the most relevant documents identified in the policy review for the purposes of the LNP.

Table A4.1: Plans, policies, and strategies reviewed in relation to landscape and townscape

Document title	Year of publication
National Planning Policy Framework (NPPF)	2019
The 25 Year Environment Plan	2018
The National Design Guide	2019
National Model Design Code	2021
The London Plan 2021	2021
Residential Density Technical Paper	2020
Lewisham Tall Buildings Study	2021
Lewisham Characterisation Study	2019
Lewisham Local Plan: Core Strategy (2011-2026)	2011
Lewisham Site Allocations Local Plan (2011-2026)	2013
Lewisham Local Plan (2020-2040)	Emerging Local Plan
Royal Greenwich Local Plan (2013-2028)	2014

The key messages emerging from the review are summarised below:

- The LNP will be required to be in general conformity with the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land, and cultural landscapes. The positive contribution that land remediation can make in terms of addressing, degraded, derelict, contaminated and unstable land is recognised.
- The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces.
- The Lewisham Characterisation Study sets out a description of the physical form of the borough, its history, places, streets, and buildings. This analysis helps to provide an understanding of the attributes which make the borough of Lewisham what it is today, how its character varies across the borough

and how this local distinctiveness might inform future approaches to managing growth and change. It is expected that the Study will also inform decisions made by Council officers and should be an important tool used by developers and others investing in Lewisham to ensure proposals positively respond to the local context.

- The objective of the Lewisham Tall Buildings Study is to provide a methodology for determining the appropriate scale and location of tall buildings within Lewisham by undertaking a process of analysis, policy examination and good practice. Buildings will be expected to be of a height which is appropriate to their location and designed to high standards. The Study is intended to support The London Plan's good growth agenda and Lewisham Council's own growth agenda, prompted by an increasing population and further projected growth.
- The LNP will also be required to be in general conformity with the adopted Local Plan which contains policies relating to landscape and townscape quality, alongside the policies of the emerging Local Plan.

Current Baseline

Nationally protected landscapes

The Neighbourhood Plan area is not within the boundaries of a National Park, Area of Outstanding Natural Beauty, or Green Belt land.

Townscape character

Lee District Town Centre is the focal point for most of the shops, leisure, and commercial uses within the Neighbourhood Plan area, but it is not uniform in character. Much of the built fabric is historic but different parts of the centre are influenced by the activities and uses that take place within them. This is reflected in the scale and massing of buildings, the way buildings animate the streets, the streets, and spaces themselves and the layout of development. Some parts of the centre are more attractive than others and, in some areas, there is opportunity for change and enhancement.

Forming part of the evidence base for the LNP, a design-led assessment has been undertaken with a view to providing area specific design guidance for each distinctive character zone within the LNP area. The seven zones are shown in **Figure A4.1** below, with a detailed overview of the characteristics, dominant materials and features, problems and pressures from development, and opportunities provided within the draft LNP itself. This will be an essential source of evidence during the subsequent stages of the SEA process.

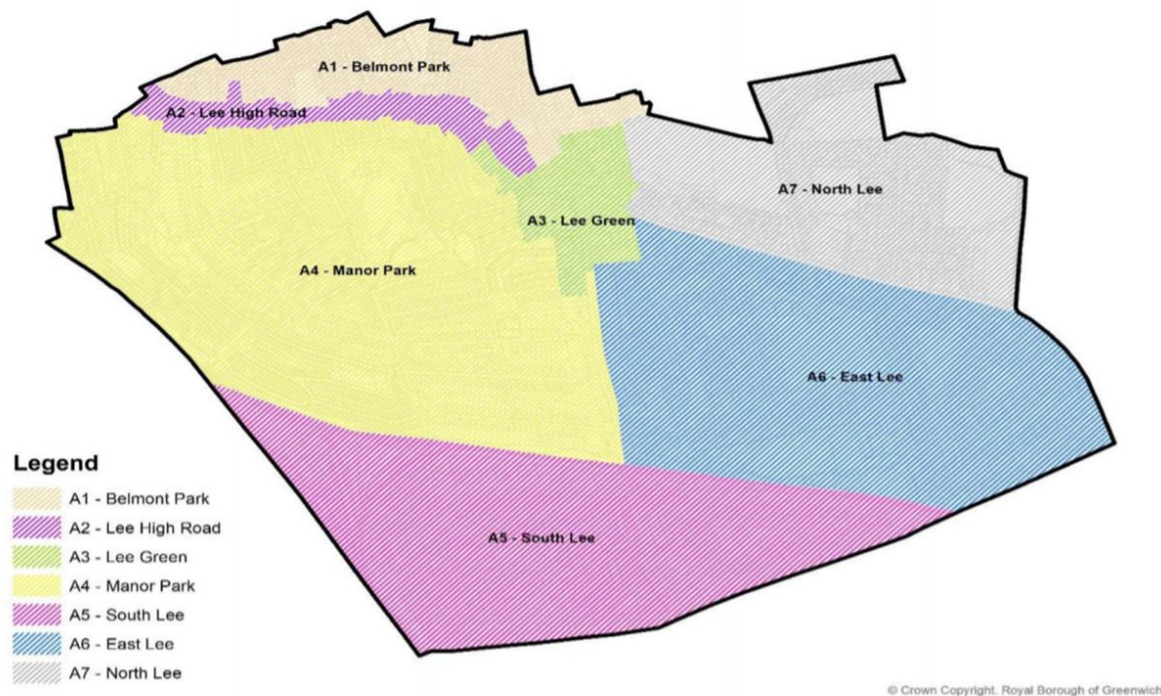


Figure A4.1: Character Zones within the LNP area

Lewisham Characterisation Study

Within the Lewisham Characterisation Study, the Neighbourhood Plan area falls within the central section (Hither Green) and the eastern section (Lee). The Study outlines typical storey heights for buildings, typical street widths, and typical block sizes for each area of the Borough, which have been informed by an overview of the urban form, building types, and streetscape for each area. A summary of Higher Green and Lee (i.e. the two neighbourhood zones which encompass the Neighbourhood Plan area) is provided below and summarised from the Lewisham Characterisation Study.

Hither Green

Hither Green is located between Lewisham, Lee and Catford. The convergence of two railway lines separates Hither Green from Lee to the east. The neighbourhood has a generally Victorian character of perimeter urban and suburban terrace typologies with some smaller estates interspersed. Smaller parades of shops are located near its train station.

Issues

- The prominence of the rail lines limit connectivity towards Lee to the east of Hither Green and disrupts the urban form.

Opportunities

- Intensify sites to the west of the station.
- Reinforce the existing character of the centre by protecting its diverse land use mix and enhancing its historic built environment.

- Improve green routes to schools, open space, and key transport nodes.
- Enhance connections across the rail line.
- Sensitive infill development where appropriate.

Lee

This area includes both the area known as Lee Green and the area of Lee nearer the station around the High Road and Belmont Hill. The boundary of this neighbourhood includes the area between the borough boundary on the eastern side to the railway tracks at the west where Hither Green begins. The area is denser than Blackheath with more tightly developed terraces of Victorian properties and several estates from the 1960s and 70s. Lee Green is designated as one of the smaller district centres and serves the needs of its immediate population with convenience shops. A significant amount of office space is located within the town centre.

Issues

- The centre has the challenge of being split between two boroughs as the borough boundary with the RB of Greenwich runs through the centre of Lee Green.
- The triangle of land associated with Hither Green depot is an obstacle to movement.
- Few connections to the River Quaggy.
- Main routes through the area are car dominated and difficult to cross.
- Relatively low levels of public open space within the neighbourhood (other than Manor House Gardens).

Opportunities

- Smaller infill development to improve the integrity of the conservation area.
- Opportunities for more tree planting on roads and public spaces.
- Reduce the dominance of traffic to improve the centre.
- Improve connections with the Quaggy and to open space.
- Increase tree planting and improve the public realm.
- Develop a strategy to bring several key sites into more intensive use.

Locally valued landscape and townscape features

A particular feature of the LNP area is its trees, with the diversity of species and the quality of some individual trees are important to the character of the public realm. Lewisham Council have also designated Tree Preservation Orders (TPOs) in the interest of their amenity value.

Whilst many of the town's trees benefit from the protection afforded by TPOs many others, that contribute to the town's character, are not protected.

Future Baseline

New development, including infrastructure development, has the potential to lead to incremental changes in landscape and townscape quality in and around the LNP area. In the absence of the LNP, more speculative development may come forward which could exacerbate the existing issues within the LNP area (as highlighted within the Lewisham Characterisation Study).

However, locally distinctive landscape and townscape features, characteristics and special qualities can be protected, managed, and enhanced through the Neighbourhood Plan. For example, new development that is appropriately designed has the potential to support the area's character and quality. This may include regeneration and brownfield development that improves the setting of each of the seven distinctive character zones within the LNP area, delivering green infrastructure improvements and/ or new recreational opportunities, and enhanced framing of key views.

A.5 Historic Environment

Policy Context

Table A5.1 below presents the most relevant documents identified in the policy review for the purposes of the LNP.

Table A5.1: Plans, policies, and strategies reviewed in relation to historic environment

Document title	Year of publication
National Planning Policy Framework (NPPF)	2019
The 25 Year Environment Plan	2018
The National Design Guide	2019
Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management	2019
Historic England Advice Note 3: The Setting of Heritage Assets	2017
Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)	2016
Lee Manor Conservation Area Character Appraisal	2008
Blackheath Conservation Area Appraisal	2007
The London Plan 2021	2021
Lewisham Local Plan: Core Strategy (2011-2026)	2011
Lewisham Site Allocations Local Plan (2011-2026)	2013
Lewisham Local Plan (2020-2040)	Emerging Local Plan
Royal Greenwich Local Plan (2013-2028)	2014

The key messages emerging from the review are summarised below:

- The key high-level principles for the conservation and enhancement of the historic environment are as follows:
 - The historic environment is a shared resource

- Everyone should be able to participate in sustaining the historic environment
- Understanding the significance of places is vital
- Significant places should be managed to sustain their values
- Decisions about change must be reasonable, transparent, and consistent
- Documenting and learning from decisions is essential.
 - The significance of places is the key element which underpins the conservation and enhancement of the historic environment as well as gives conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building an archaeological site or a larger historic area such as a whole village or landscape.
 - The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces.
 - The LNP will be required to be in general conformity with the NPPF, which ultimately seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. Planning Practice Guidance expands on the NPPF recognising the proactive rather than passive nature of conservation.
 - The role of the historic environment, as part of healthy and thriving ecosystems, landscapes, and cultural values, including settlement identity, is reiterated through the key messages of the 25 Year Environment Plan and National Design Guide.
 - Historic England's Advice Notes provide further guidance in relation to the conservation and enhancement of the historic environment. Of relevance for the LNP is the emphasis on the importance of:
- Understanding the different types of special architectural and historic interest which underpin designations, as well as how settings and/ or views contribute to the significance of heritage assets.
- Recognising the value of implementing controls through neighbourhood plans, conservation area appraisals and management plans; and
- Appropriate evidence gathering, including clearly identifying those issues that threaten an area or assets character or appearance and that merit the introduction of management measures.
 - The LNP will also be required to be in general conformity with the local plan which contains policies directly relating to the historic environment, townscape, and landscape. The Neighbourhood Plan will also need to acknowledge the emerging policies in the emerging local plan.

- In addition to conserving the historic environment, the LNP should seek to identify opportunities to enhance the fabric and setting of the historic environment. It should also seek to rejuvenate features and areas which are at risk of neglect and decay.

Current Baseline

Historic character of the Neighbourhood Plan area

An overview of the historic character and evolution of the Neighbourhood Plan area is provided below (with a focus on a few key dates) and has been collated and summarised from the LNP.

“Within the [LNP] area there is an impressive variety of heritage architecture, from the Georgian Merchant Taylors Almshouses, to the impressive French Baroque houses along Micheldever Road, to Pentland House on Old Road, all of which contribute to a strong identity within the Forum area and the wider region as a whole.

“The name “Lee” refers to a place which lies sheltered. The first recorded mention of the name is in the Domesday Book (1085) from which it appears that the Manor of Lee was in the possession of Odo, Bishop of Bayeux and Earl of Kent, half-brother of William the Conqueror. Changes in ownership of the manor continued over the centuries, at the behest of various monarchs.

“One of only two Grade I listed buildings in the London Borough of Lewisham (the other being St Paul’s church in Deptford), Boone’s Chapel [which was constructed in 1683] is attributed to Wren, but his friend and colleague, Robert Hooke, was involved in the construction. During restoration of the chapel the 229 graves of Christopher Boone and his wife Mary Boone were discovered and restored.

“In 1778, [the Grade II listed ‘The Manor House’] was bought by Francis Baring and owned by the family, along with surrounding land, until 1900, when ownership was transferred to the newly established local government (Manor House Gardens and Manor House Library)”*

“In 1895, Hither Green Railway Station opened at the junction of the railway lines. The junction had been established 30 years earlier. The main booking office was in Staplehurst Road, with another access/booking office in Springbank Road and the foot tunnel to both sides. There was provision on a large open area for sidings, marshalling yards and other railway use. A great deal of development then took place on both sides of the track, on former nurseries, orchards, and farmland.

“The Meridian Line bisects the foot tunnel entrance at Hither Green Station and is marked by an overhead plaque. From there it enters Manor Park, crosses Lee High Road and has its second plaque in the London Borough of Lewisham on the pavement outside Halley Gardens. In Halley Gardens it is marked again under a pretty rose garlanded pergola. It leaves the [LNP] area on its way to old St Margaret’s churchyard, and then on to Greenwich.”

Designated heritage assets and areas

The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent.

An overview of the designated historic environment assets present in the Neighbourhood Plan area is provided below.

Listed buildings

Listed buildings are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.⁴⁴ According to the National Heritage List for England⁴⁵, the Neighbourhood Plan area contains 20 listed buildings, including one Grade I listed buildings, one Grade II* listed buildings and 18 Grade II listed buildings. The Grade I and Grade II* listed buildings are as follows:

- Boone's Chapel (with short abutting wall to the east) (Grade I)
- Manor House Library (Lee Public Library) (Grade II*)

Historic parks and gardens

Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance. In this respect, the Grade II listed 'Manor House Gardens' is located within the north western section of the LNP area and is wholly within the Lee Manor Conservation Area. A brief extract from the official listing for Manor House Gardens (accessible on Historic England's database) states⁴⁶:

"The lease of 1736 describes the site as having a house with a courtyard, coach house, and privy, with pleasure grounds as well as a kitchen garden and an orchard. From 1796 the Manor House and grounds were owned by the Baring family. Between c 1884 and 1899 the [Grade II listed] House was used as a military academy. In 1901 the owner, Sir Francis Thornhill Baring (later Lord Northbrook), sold the property to London County Council who in the following year opened the grounds to the public. The site remains (1998) in use as a public park.*

"Built of yellow stock brick with low pitched slate roofs, Manor House is an elegant five by three-bay structure on a rusticated stone basement and with a stone entablature. The north front has a taller, projecting three-bay centre and a four-column, one-storey porch, now glazed. The south (garden) front is of similar style and proportions but with a full-height bow in the centre. Used since the early C20 as a public library, the Manor House is separated from the gardens by late C20 iron railings.

Conservation areas

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater

⁴⁴ Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available at [this link](#)

⁴⁵ Historic England (2020): 'National Heritage List for England – Advanced Search', [online] available to access via [this link](#)

⁴⁶ Historic England (2021): 'Manor House Gardens', [online] available to access via [this link](#)

understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England⁴⁷.

Much of the Neighbourhood Plan area's historic character has been preserved to this day and this forms an important part of the town's identity. This is recognised by the designation of two conservation areas located wholly or partly within the Neighbourhood Plan area, specifically: Lee Manor Conservation Area (wholly within the north western section of the LNP area), and Blackheath Conservation Area (partly within the northern section of the LNP area, but primarily within Blackheath Ward, adjacent to the LNP area). Many of the LNP area's listed buildings are located within these areas.

Lee Forum are keen to explore opportunities to designate additional conservation areas within the Neighbourhood Plan area, including at Lee Green Town Centre, Lee High Road, Manor Park, and Cambridge Drive. These are shown in the figure at the end of this chapter, along with the additional heritage designations which have been discussed. Applications for the formal designation of Lee Green Town Centre and Lee High Road as conservation areas has been presented to Lewisham Council. Additionally, Lee Green Crossroads has been acknowledged by the Mayor of London's heritage advisor as a location which could benefit from a conservation area designation.

An overview of the special interest of the Lee Manor Conservation Area and Blackheath Conservation Area is provided below (taken from their respective conservation area appraisal documents, as referenced in **Table A5.1** above). The documents will be an essential source of evidence during the next stages of the SEA process.

These documents do not, however, cover the whole of the LNP area. This leaves certain areas (including parts of the Lee District Town Centre and other non-residential areas) without any specific character-related design guidance. Additionally, it is important to note that the conservation area appraisals are relatively dated (prepared over 10 years ago) and may benefit from an update and refresh to reflect the latest available information with regards to conserving and enhancing the special qualities of the areas.

Lee Manor Conservation Area

The conservation area contains two areas with distinctly different spatial character which are divided by the course of Taunton Road. To the south of Taunton Road, the roads follow a regular, planned grid of streets with the east - west aligned routes crossed by others running from north to south. This street grid was created for the planned development of the area in the late 19th and early 20th century and includes the older course of Burnt Ash Road, from which the streets were laid out westwards. The railway line to the south forms a boundary to this area and is on a parallel alignment to the east - west oriented roads.

North of Taunton Road, the conservation area is dominated by the pedestrian area of the Manor House Gardens park and the cluster of buildings along Old Road at the conservation area's northern limit. The Manor House Gardens are well enclosed by buildings to the east, south and north and tall trees to the west and, therefore, is inward looking. It is currently divided from the Manor House (Lee Public Lending

⁴⁷ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via [this link](#)

Library) although it is planned to create better links between this building and the park in future. Old Road is a short east – west aligned road with outward views blocked by the dense surrounding buildings. It has the feeling of a quiet, leafy back street, behind the busier Lee High Road to the north.

Split into three-character areas (as highlighted below), almost all the historic buildings in the conservation area make a positive contribution to its distinctive character and appearance. These are shown in **Figure A5.1**.

- Character area 1: the late 19th and early 20th century residential area forming the core of the conservation area.
- Character area 2: The Manor House and Manor House Gardens with buildings on Old Road and Lochaber Hall.
- Character area 3: Lee Railway Station and the surrounding commercial area, former Council Depot, and Southbrook Mews.

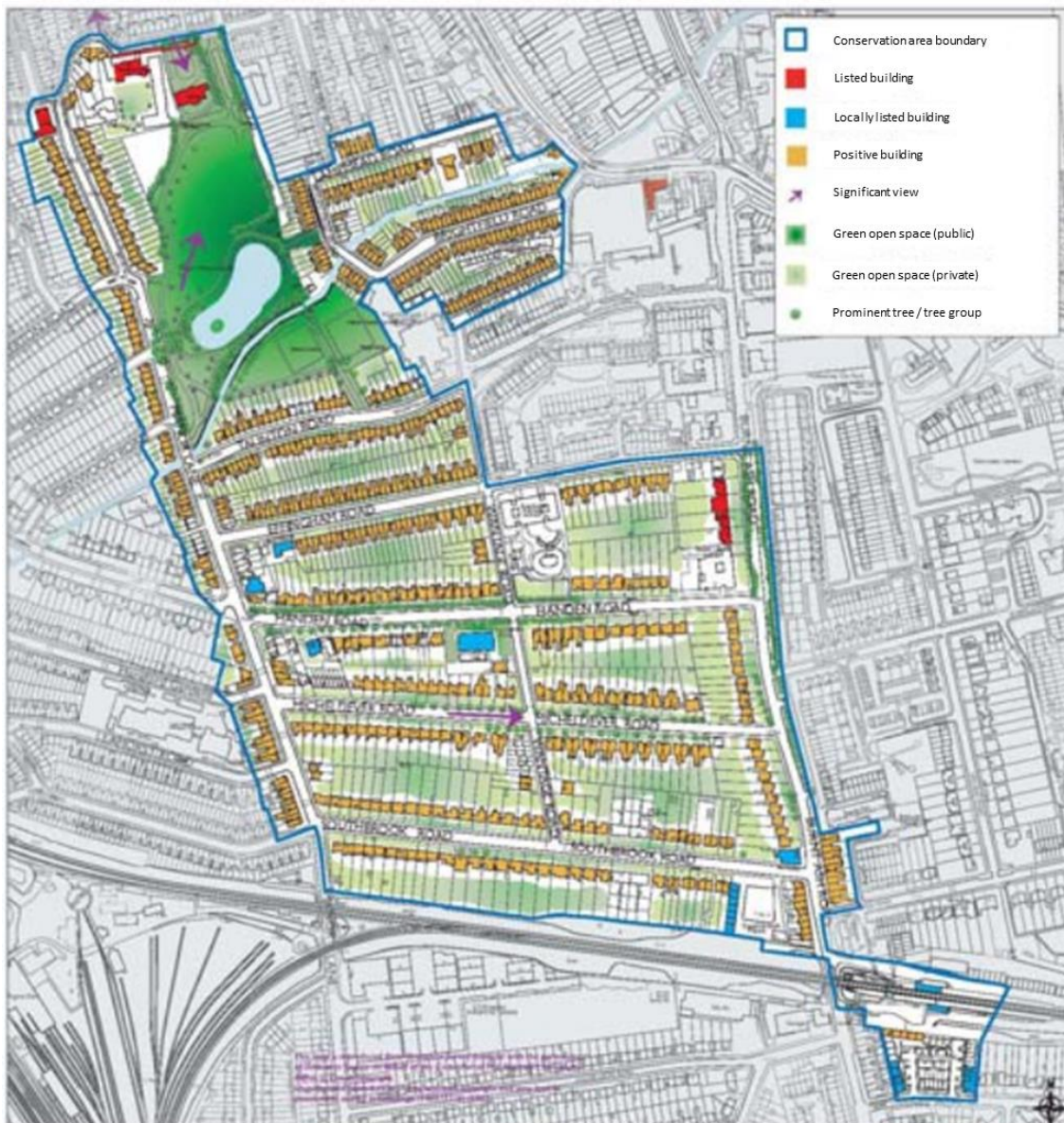


Figure A5.1: Buildings and spaces which make a positive contribution to the special interest of the Lee Manor Conservation Area

Blackheath Conservation Area

Blackheath was one of the earliest conservation areas to be designated and presently covers one of the largest areas of designation in South London. Its continued relevance to London and Londoners is reflected in its year-round use as a recreation space of metropolitan importance, general amenity space and venue for major events such as the London Marathon.

Being such a large conservation area (within only a small section overlapping with the LNP area), Blackheath has been divided into 17 distinctive sub-areas. The character appraisal document refers to the following key factors for each sub-area: street layout, building types/periods, scale and building line, local details and relative quality and degree of heritage assets intact.

Locally important heritage features

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work, or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, areas of archaeological priority, open spaces, key distinctive buildings, and traditional shop frontages (particularly along Lee High Road, Lee Road, Manor Lane, and Staplehurst Road) are likely to have a local historic value. Additionally, the quality and diversity of architecture in the LNP area is a defining feature and contributes strongly to the quality of the built environment.

Accessed via the Heritage Gateway⁴⁸, the Greater London Historic Environmental Record (HER)⁴⁹ identifies the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place of the Neighbourhood Plan area. Additionally, Lee Forum have prepared a list of 86 locally listed buildings assets which are valued by the community. Further detail on the locally listed buildings and assets can be viewed on Lewisham Council⁵⁰ and the RB of Greenwich's⁵¹ webpages.

During the subsequent stages of the SEA process, the Greater London HER and Council webpages will be reviewed in greater detail to determine which heritage features are likely to be impacted by the preferred development strategy within the Neighbourhood Plan (and reasonable alternatives).

Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2020 Heritage at Risk Register for South East England⁵², there are 18 heritage assets at risk within Lewisham, none of which are within the boundaries of the Neighbourhood Plan area.

⁴⁸ Heritage Gateway (2020): 'Detailed Search' [online database] available to access via [this link](#)

⁴⁹ Historic England (2021): 'Greater London HER', [online] available to access via [this link](#)

⁵⁰ Lewisham Council (2021): 'Locally Listed Buildings', [online] available to access via [this link](#)

⁵¹ RB of Greenwich (2021): 'Local Heritage List', [online] available to access via [this link](#)

⁵² Historic England (2020): 'Heritage at Risk Register: South East England' [online] available to access via: [this link](#)

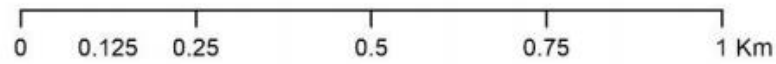
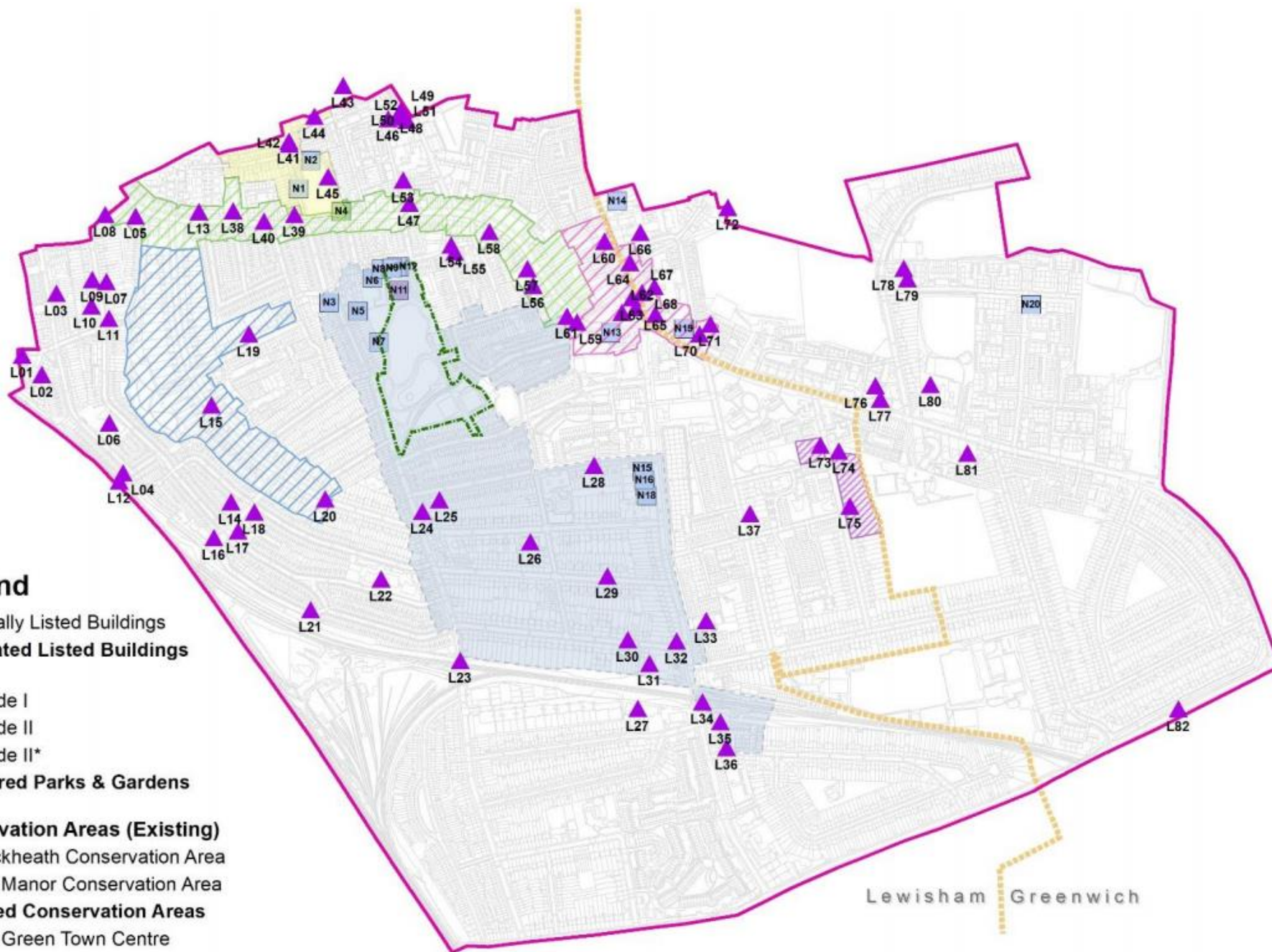
Future Baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout, and increasing the impacts of traffic within conservation areas. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the conservation areas, support historic townscape character, and better reveal assets' heritage significance.

Legend

- ▲ Locally Listed Buildings
- Designated Listed Buildings**
- Grade**
- Grade I
- Grade II
- Grade II*
- Registered Parks & Gardens**
- Conservation Areas (Existing)
- Blackheath Conservation Area
- Lee Manor Conservation Area
- Proposed Conservation Areas**
- Lee Green Town Centre
- Lee High Road
- Manor Park
- Cambridge Drive



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A.6 Land, Soil, and Water Resources

Policy Context

Table A6.1 below presents the most relevant documents identified in the policy review for the purposes of the LNP.

Table A6.1: Plans, policies, and strategies reviewed in relation to land, soil, and water resources

Document title	Year of publication
National Planning Policy Framework (NPPF)	2019
The 25 Year Environment Plan	2018
Safeguarding our Soils: A strategy for England	2009
Future Water: The government's water strategy for England	2011
Water for Life	2011
The National Waste Management Plan	2013
Thames River Basin District Management Plan	2015
Lewisham River Corridors Improvement Plan (RCIP)	2015
The London Plan 2021	2021
Lewisham Local Plan: Core Strategy (2011-2026)	2011
Lewisham Site Allocations Local Plan (2011-2026)	2013
Lewisham Local Plan (2020-2040)	Emerging Local Plan
Royal Greenwich Local Plan (2013-2028)	2014

The key messages emerging from the review are summarised below:

- The LNP will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources, and improve the water environment; recognising the wider benefits of natural capital and derived from ecosystem services. The NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.
- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero waste economy.

- Furthermore, the LNP will also be required to take note of and be in general conformity with the adopted Local Plan, which contains policies specifically relating to efficient land use, water resources and the sustainable use of resources. It will also be necessary for the LNP to be in general conformity with the emerging Local Plan.

Current Baseline

Soil resources

Most of Lewisham Borough and the RB of Greenwich is underlain by the Thames Group rock type which consists mostly of the London Clay Formation. In terms of the location of the best and most versatile agricultural land, most of the Neighbourhood Plan area is urbanised. In this context, a 'brownfield first' approach to development is encouraged by Lee Forum. Most (if not all) of the known available sites for development within the LNP area are located on previously developed land and therefore, it is not anticipated that the proposals within LNP would displace BMV land. The land use classifications within the LNP area are shown in **Figure A6.1**.

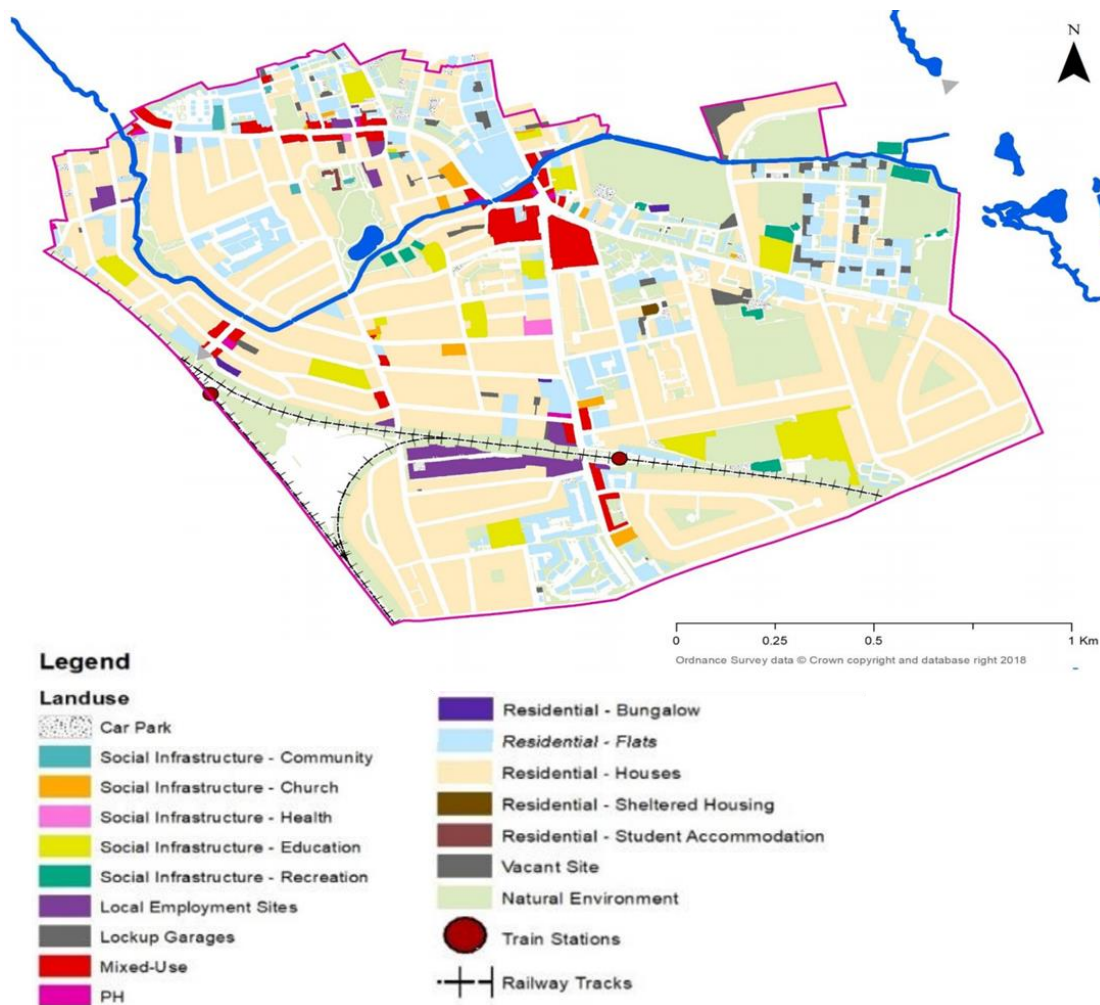


Figure A6.1: Land use within the LNP area (taken from the draft LNP)

Water resources and quality

The Neighbourhood Plan area is located within the Thames River Basin District. The main watercourse is the River Quaggy, which passes through the northern and north western sections of the LNP area (including sections of Manor House Gardens, and

Lee District Town Centre). Completed in 2015, Lewisham's River Corridors Improvement Plan contains a character assessment of the Quaggy, with extracts of the assessment provided below:

“The extent of the river flowing into [Lewisham] Borough from the Royal Borough of Greenwich is urban in character, until the river reaches Manor House Gardens. A fairly natural section of the river flows through the south of the formal park, along a gently meandering course over a clean gravelly river bed. Further west, at Manor Park, the river runs between the park, from which it is fenced off, and the back gardens of the adjacent houses. The river flows over a natural gravel bed and is retained by wooden revetments.

“Environmental enhancements could include the removal of unsightly rubbish, restoration of the river corridors and/ or repairs to existing flood defences. Maintenance of existing hard and soft landscaping could improve the environmental quality of the Public Rights of Way network along the river.

“Physical and visual barriers between Public Rights of Way and the river corridors include concrete channels and culverts, walls, fences, and buildings. For instance, the River Quaggy runs through an area fenced off from Manor Park and the back gardens of the adjacent houses. Footbridges, viewing platforms, board works, signage and street furniture can integrate the river corridors into the public realm, improving physical and visual links between Public Rights of Way and Lewisham's rivers.”

As shown on the Environment Agency's Catchment Data Explorer⁵³, the most recently completed water quality assessments undertaken in 2019 classifies the Quaggy as having a 'moderate' ecological status and a 'fail' chemical status. The reasons for not achieving good status (RNAGs) are primarily attributed to the following activities: leaking utility sewers, sewage discharge (intermittent), barriers and misconnections (ecological discontinuity), urban development, and transport drainage.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. In this respect, most of the LNP area overlaps with the following SPZs: Zone II: Outer Protection, and Zone III: Total Catchment.

It is considered unlikely that the development likely to come through the Neighbourhood Plan will have a significant impact on SPZs.

Future Baseline

Given that the Neighbourhood Plan encourages development on previously developed land, it is not anticipated that Neighbourhood Plan proposals would displace best and most versatile agricultural land.

Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead

⁵³ Environment Agency (2021): 'Catchment Data Explorer: Quaggy', [online] available to access via [this link](#)

to continued improvements to water quality within the Neighbourhood Plan area and wider area.

The provisions of Lewisham's River Corridors Improvement Plan, the emerging Local Plan, and the draft LNP also seek to facilitate improvements to the River Quaggy, both environmentally and recreationally. This is discussed in further detail within the 'Community Wellbeing' and 'Transportation' chapters of this Scoping Report. In this respect, it is anticipated that the LNP proposals should protect and manage water resources in a sustainable manner, protecting them from pollution.

A.7 Community Wellbeing

Policy Context

Table A7.1 below presents the most relevant documents identified in the policy review for the purposes of the LNP.

Table A7.1: Plans, policies, and strategies reviewed in relation to community wellbeing

Document title	Year of publication
National Planning Policy Framework (NPPF)	2019
National Planning Practice Guidance – Healthy and Safe Communities	2019
The 25 Year Environment Plan	2018
Health Equity in England: The Marmot Review 10 Years On	2020
Planning for Sport Guidance	2019
Lewisham Strategic Housing Market Assessment (SHMA)	2019
Lewisham Open Space Assessment	2020
The London Plan 2021	2021
Metropolitan Open Land Review	2020
Lewisham Local Plan: Core Strategy (2011-2026)	2011
Lewisham Site Allocations Local Plan (2011-2026)	2013
Lewisham Local Plan (2020-2040)	Emerging Local Plan
Royal Greenwich Local Plan (2013-2028)	2014

The key messages emerging from the review are summarised below:

- The LNP will be required to be in general conformity with the NPPF, which overall seeks to retain and enhance access to community services and facilities, including health facilities, educational facilities, and open space. The NPPF recognises the benefits of a range of local provisions supporting community needs, including in rural areas. The framework seeks to protect settlement and community identities. Furthermore, the NPPF recognises the benefits of creating cohesive communities, in safe environments where crime and the fear of crime do not undermine the quality of life of residents.
- The Borough's housing, homelessness, and community strategies each seek to support the appropriate delivery of housing and community infrastructure. The strategies recognise the importance of targeting resources at those most at risk/ most vulnerable and supporting all residents needs for affordable, safe, and good quality housing in the right places. Furthermore, the strategies recognise the need to create choice in terms of securing a long-term stable home and create adaptable homes supported by high levels of accessibility.
- In addition, the LNP will be required to be in general conformity with the adopted Local Plan which include policies relating to the provision and type of housing, supply of employment land, retail provision, residential amenity, and tourism services.

- The 2020 Health Equity in England Report identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined.
- The Planning for Sport Guidance seeks to help the planning system provide formal and informal opportunities for everyone to take part in sport and be physically active. The Guidance outlines 12 'planning-for-sport' principles.
- The LNP will also be required to be in general conformity with the Local Plan which contains policies directly relating to town uses, the economy and community facilities. The LNP will also need to acknowledge the emerging policies in the emerging Local Plan.

Current Baseline

Population and age structure

Based on 2011 Census data⁵⁴, the LNP area has an approximate resident population of 20,650 which represents 7.5% of the total population of Lewisham Borough (275,885).

The mean age of the LNP area is 37 years, compared to a mean age of 35 years for residents in the whole of Lewisham Borough. The predominant age band in the LNP area is 30 to 44, which represents approximately 29.0% of the total population.

Index of Multiple Deprivation

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.

⁵⁴ Accessible on the LNP website's evidence page, within the document 'Basic facts about the LNP area', accessed via [this link](#)

- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - ‘Geographical Barriers’: relating to the physical proximity of local services
 - ‘Wider Barriers’: relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - ‘Indoors Living Environment’ measures the quality of housing.
 - ‘Outdoors Living Environment’ measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
 - **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
 - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)⁵⁵ are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs.

In this respect, a map of the IMD in the Neighbourhood Plan area is shown in **Figure A7.1** below. The ‘warmer’ colours show more deprived populations in the Neighbourhood Plan area and the ‘cooler’ colours show less deprivation.

The level of deprivation varies across the Neighbourhood Plan area. For example, the LSOA that the Lee District Town Centre sits within is amongst the 30% most deprived neighbourhoods in the country. However, the LSOA to west that contains the Manor House Gardens is amongst the 40% least deprived neighbourhoods in the country. Barriers to housing and services and the quality of the living environment is a particular concern across the whole of the Neighbourhood Plan area, based on the IMD.

⁵⁵ DCLG (2019): Indices of Deprivation Explorer’, [online] available via [this link](#)

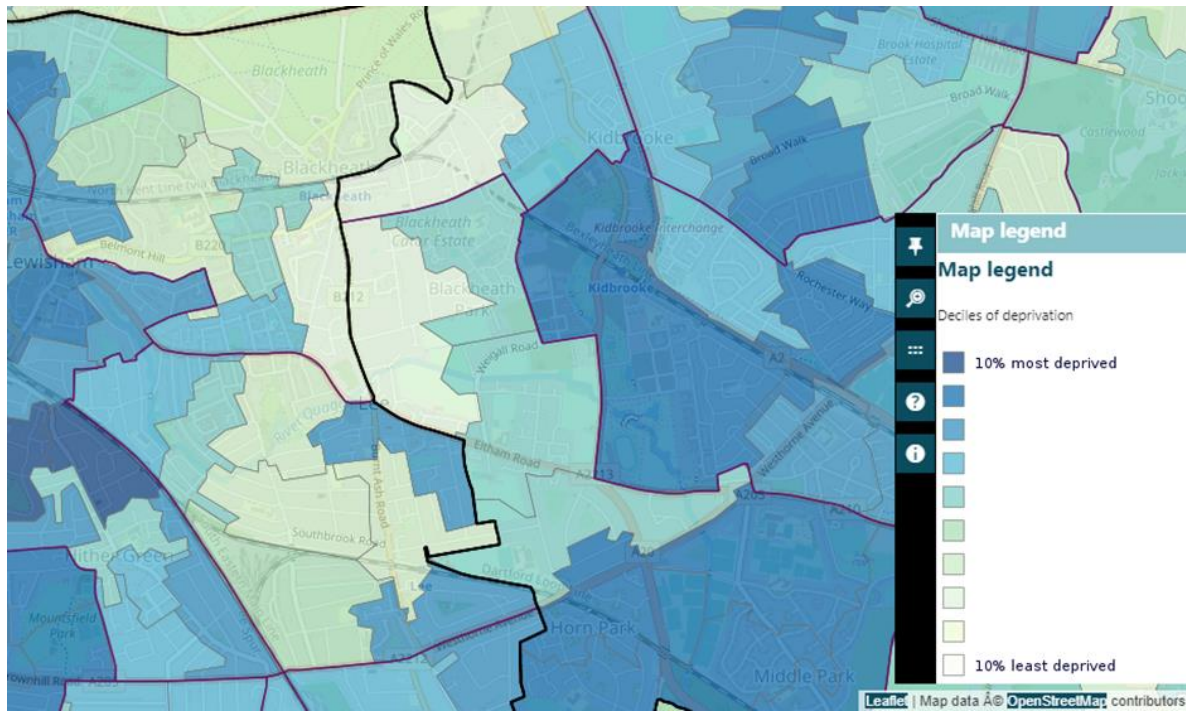


Figure A7.1: Overall deprivation levels within the Neighbourhood Plan area

Housing (type, tenure, affordability)

Reflecting 2011 Census data, the LNP area contains 9,242 households, which represent approximately 8.0% of Lewisham Borough’s 116,091 households. The household split by tenure is shown in **Figure A7.2**, below.

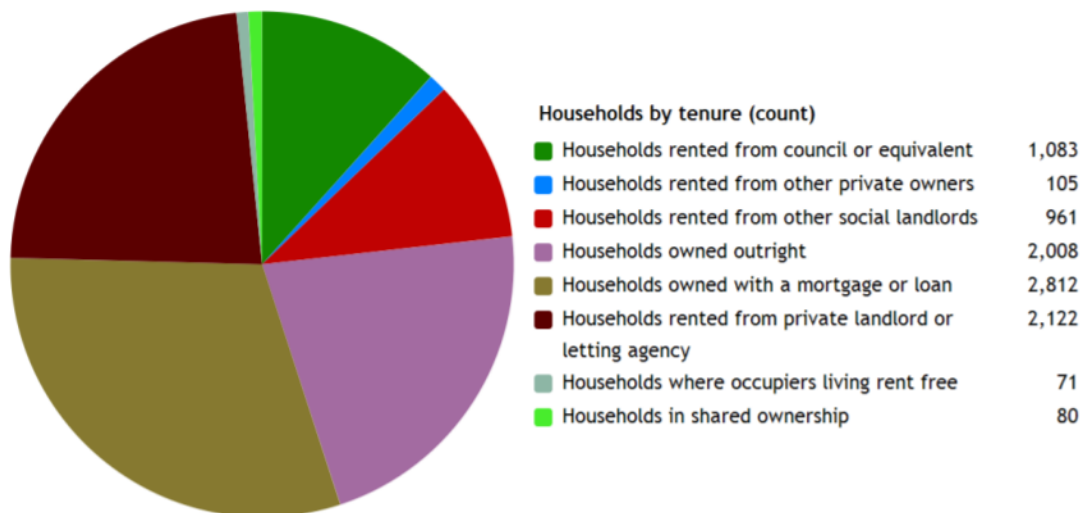


Figure A7.2: Household tenure within the LNP area

Affordability is a key issue within the LNP area (and across London, as a whole). The shortage of affordable homes contributes to a shortage of ‘key workers’ living locally, increasing levels of inward commuting and traffic.

Education and employment

Based on 2011 Census data, approximately 45.2% of residents within the LNP area have achieved level 4 qualifications and above, with approximately 15.7% of residents having no qualifications. This is shown below in **Figure A7.3**.

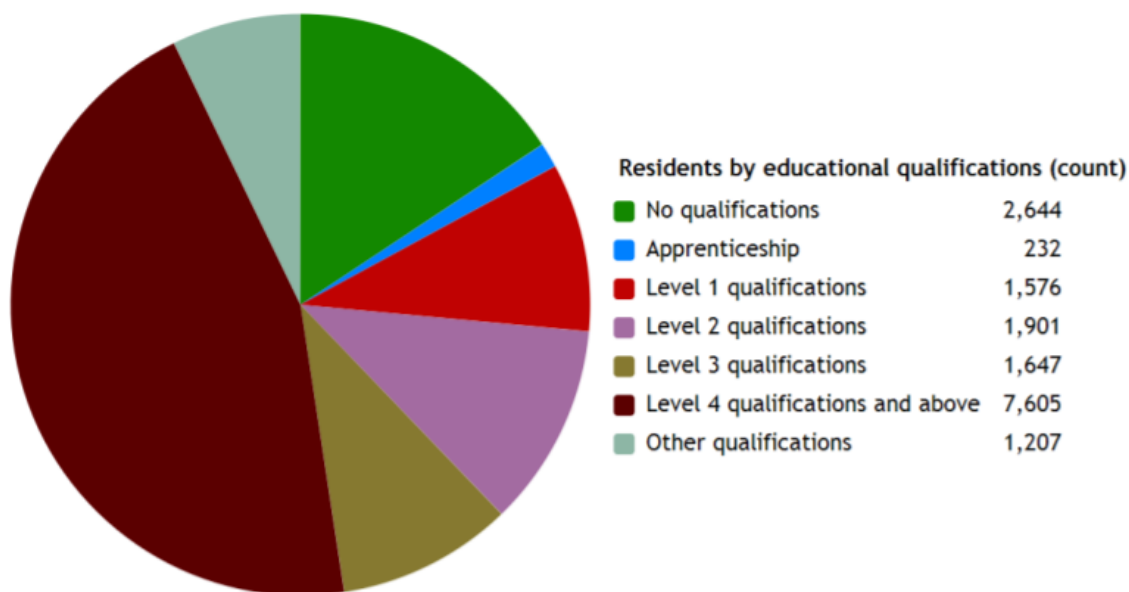


Figure A7.3: Qualifications within the Neighbourhood Plan area

The Neighbourhood Plan area is home to a skilled resident workforce with good access to employment opportunities. People both commute into and out of the Neighbourhood Plan area for work to and from central London and other parts of the City and beyond. There are two industrial estates, the Chiltonian and Southbrook, which are valued sites for local employment opportunities.

Community assets and infrastructure

Lee District Town Centre is the focal point for most of the town’s shops, leisure, and commercial uses. The town hosts a variety of national chain shops, restaurants and independent retailers and businesses. The LNP area is also home to small independent shops that are highly valued by the community. However, there is scope for a wider and more diverse range of shopping, cultural and leisure experiences within the four Local Hubs – Staplehurst Road, Manor Lane, Burnt Ash Road / Hill and Lee High Road – and, in particular, the Lee District Town Centre. These are shown in **Figure A7.4** below, along with the Chiltonian and Southbrook industrial estates.

Key services and facilities include (but is not limited to): Manor House Library; Trinity School; a number of church halls and community centres; sports and playing grounds; local public houses (such as the Duke of Edinburgh, and The Edmund Halley), restaurants and cafés, and health facilities.

A total of 23 community buildings have been identified by the local community, categorised into public houses, places of worship, community centres, library / community hubs, and sports clubs. These are shown below in **Figure A7.5** and **Figure A7.6**.

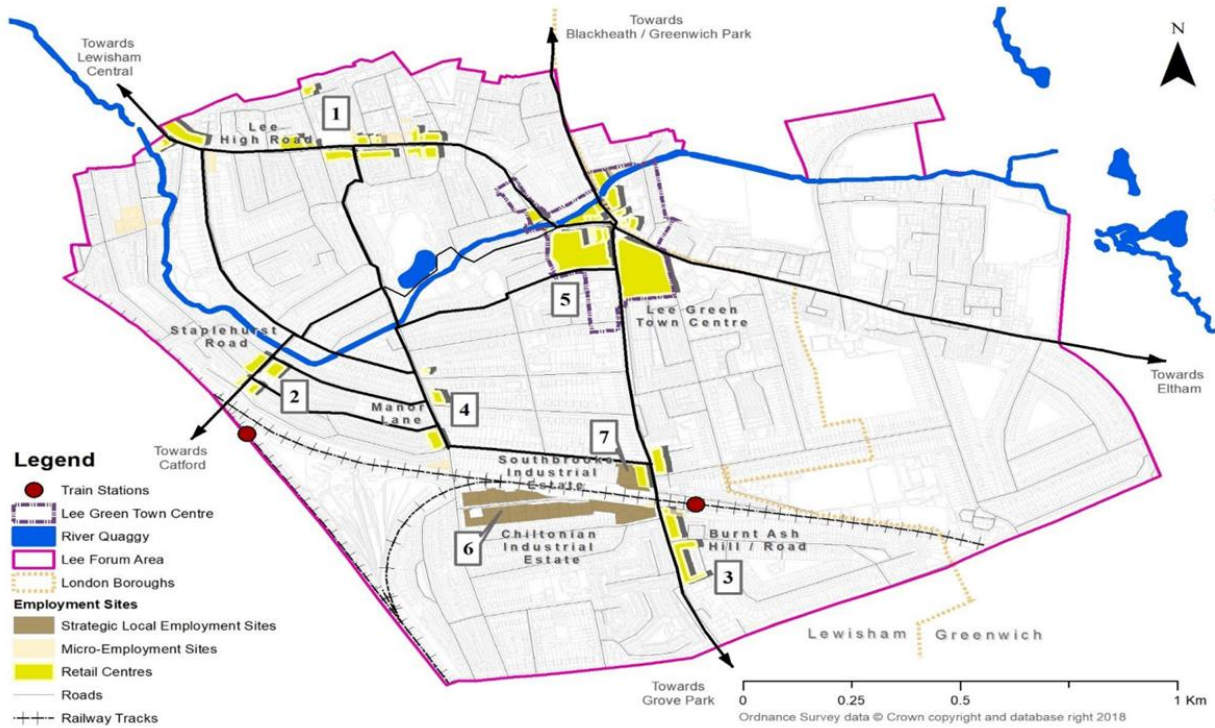


Figure A7.4: Town Centres, Local Hubs, and Employment Sites in the LNP area

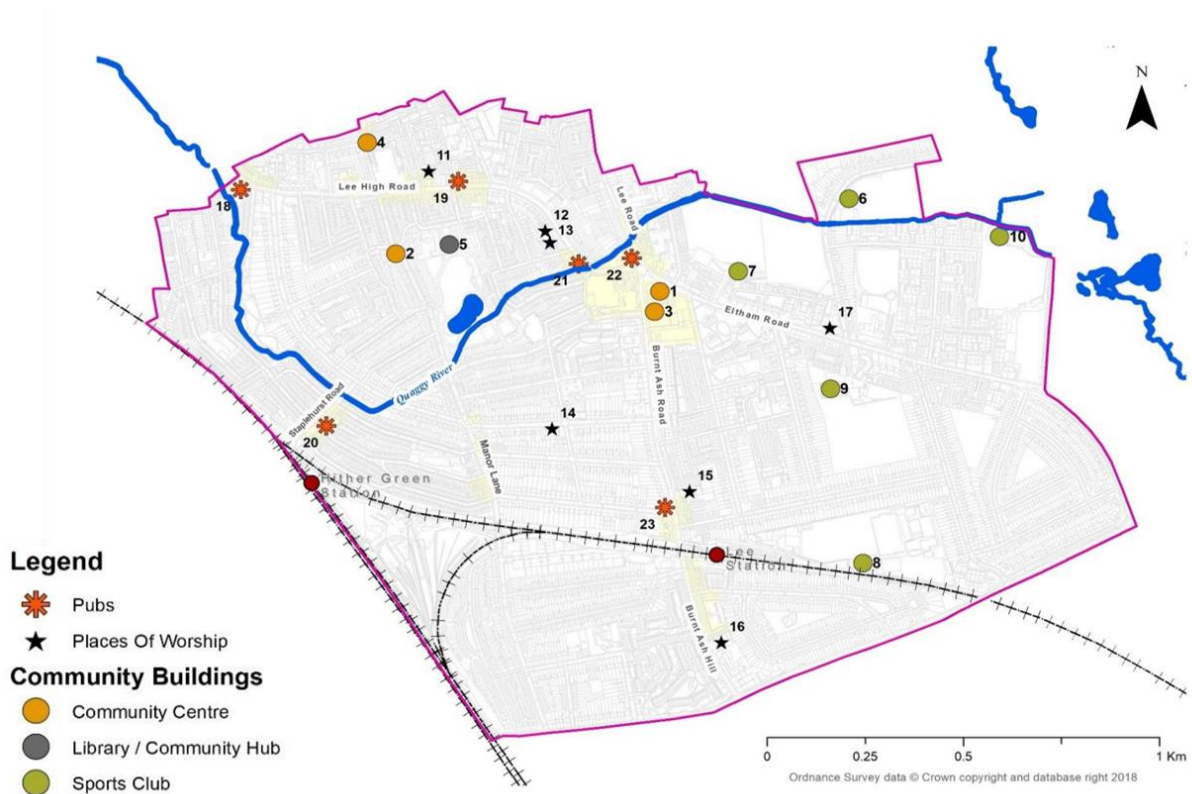


Figure A7.5: Community facilities within the LNP area

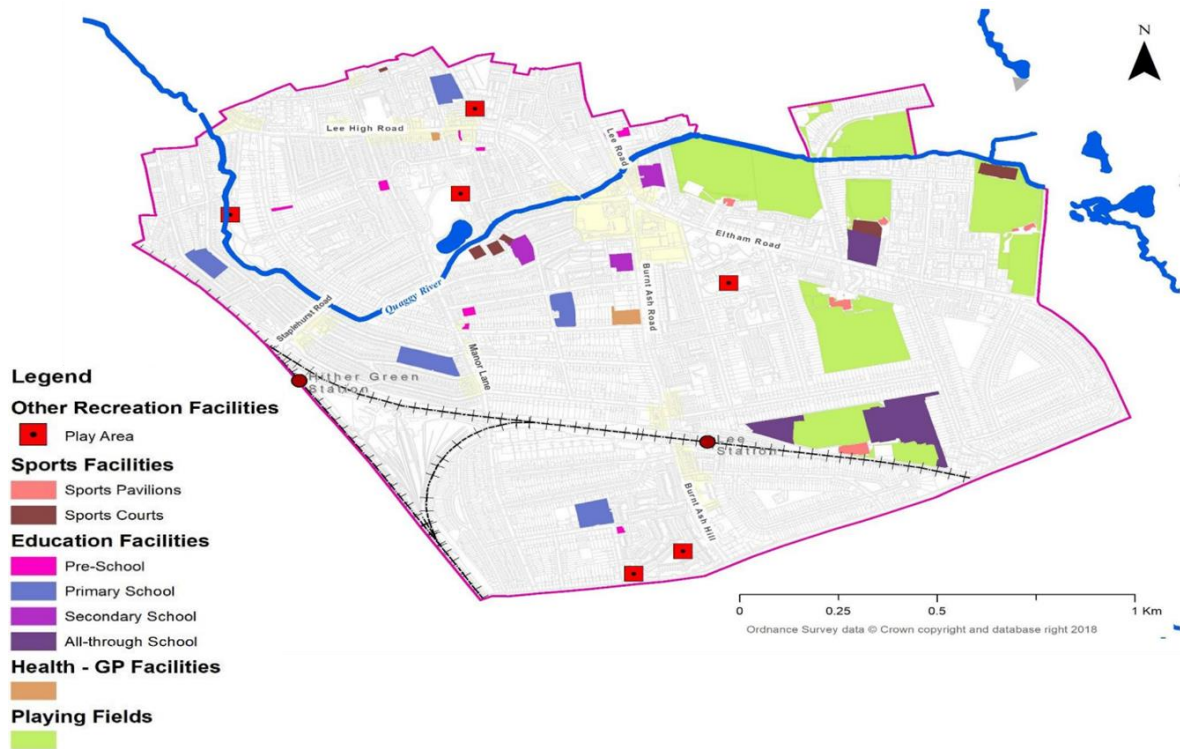


Figure A7.6: Recreation, Sports, Education, and Health facilities in the LNP area
Green and blue infrastructure networks

Access to the nation’s gardens, parks, woodlands, and rivers have played a huge part in helping people through the pandemic. Almost nine in ten adults surveyed in England reported that being in nature makes them very happy and nearly three quarters of adults were concerned about biodiversity loss in England (People and Nature Survey, Natural England)⁵⁶. The research also revealed the importance of local parks and green spaces to the nation’s mental and physical wellbeing.

In the context of the LNP area, the River Quaggy is considered as a primary green and blue corridor (see **Figure A7.7** below). Additional areas of importance include the nature reserve in Hither Green Triangle (referred to as the Hither Green Railsides SINC within Chapter 3 of this Scoping Report), three allotment sites (Dacre Park, West Crathie, East Crathie), and green streetscapes provided through urban amenity spaces which enhance the public realm.

Manor House Gardens, Manor Park and Edith Nesbit Memorial Park, community open spaces and Metropolitan Open Land (such as John Roan School Playing Fields, Bowring Sports Grounds, Crofton Albion Sports Club, Blackheath Wanderers Sports Club, Old Colfeians, and Weigall Road Sports Ground) are also seen as vital to the wellbeing and health of the community.

⁵⁶ Natural England (2020): ‘People and Nature Survey’, [online] available to access via [this link](#)

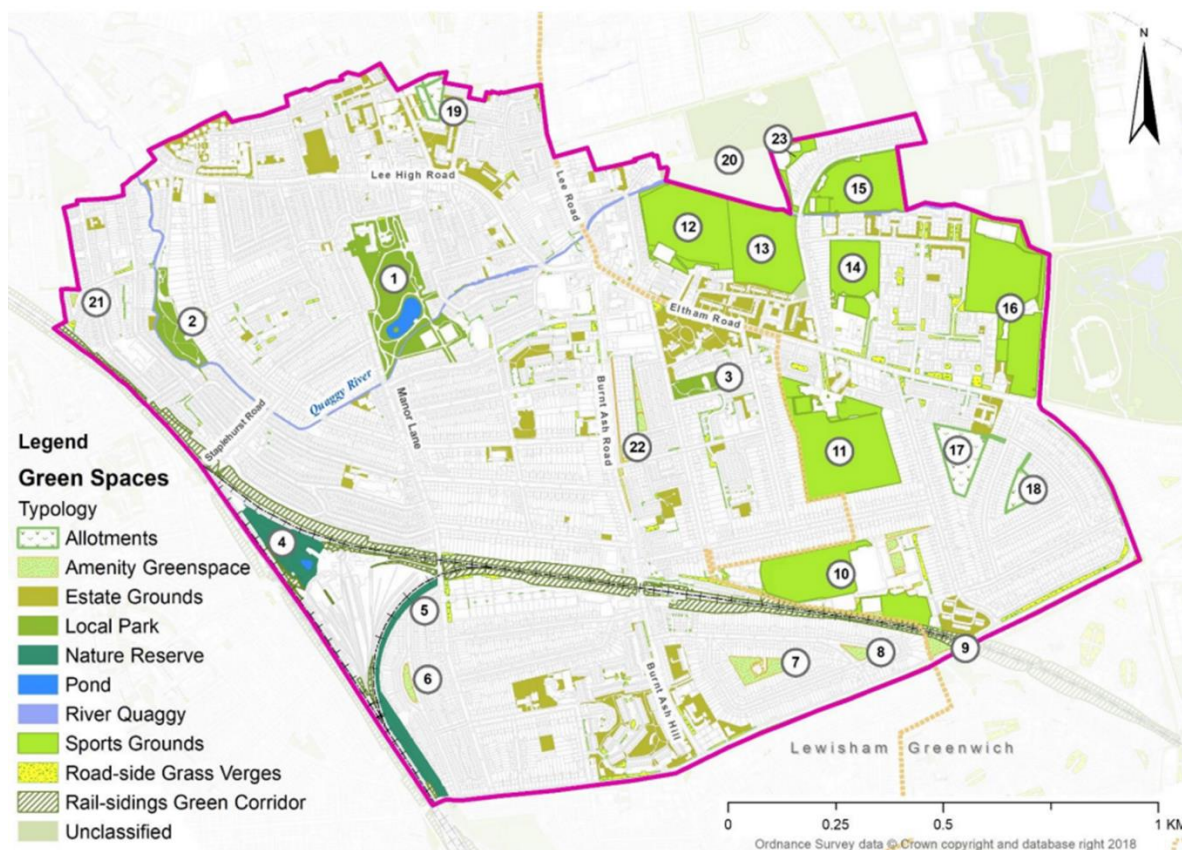


Figure A7.7: Green and blue infrastructure network within the LNP area

Future Baseline

Deprivation is a complex issue, with many factors at play. However, plan making offers an opportunity for future development to reduce deprivation by better connecting residential areas to services and educational opportunities, meeting necessary building performance standards, and creating better community cohesion.

The suitability (e.g. size and design) and affordability of housing to meet local needs will depend on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of delivering the right mix of housing types, tenures, and sizes in suitably connected places.

Considering the recovery from the Covid-19 pandemic, homeworking is likely to become a more prevalent trend, and this is likely to alter the commuting patterns and access trends of residents into the future. Whilst uncertainty remains, the LNP provides opportunities to guide development which accommodates for changing working patterns and lifestyles, and places greater emphasis on access to local services, facilities, employment options and strategic connectivity. New strategic development sites nearby may also increase accessibility for residents to some degree in the future.

A.8 Transportation

Policy Context

Table A8.1 below presents the most relevant documents identified in the policy review for the purposes of the LNP.

Table A8.1: Plans, policies, and strategies reviewed in relation to transportation

The key messages emerging from the review are summarised below:

- The LNP will be required to be in general conformity with the NPPF, which seeks the consideration of transport issues from the earliest stages of plan-making and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport. Larger developments are expected to be delivered in areas which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.
- National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliability of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of a longer journeys. This includes investment in new and upgraded infrastructure, changing perceptions, and increasing safety.
- Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this respect, the Mayor's Transport Strategy and the Lewisham Transport Strategy are strategic policy tools through which planning authorities exercise their responsibilities for planning, management, and the development of transport across the borough (and wider city).
- Healthy Streets is the framework of the Mayor's Transport Strategy, putting human health and experience at the heart of planning the city. The key chapters - *healthy Streets and healthy people; a good public transport experience; and new homes and jobs* - all apply the Healthy Streets approach to deliver the aims of the strategy, including:
 - 80 per cent of all trips in London to be made by walking, cycling and public transport by 2041.
 - All Londoners to do at least 20 minutes of active travel each day by 2041.

Current Baseline

Rail and bus networks

Most homes within the Neighbourhood Plan area are located within 1km from a train station, including Hither Green station and Lee station. Hither Green is a busy commuter station with services to several London termini (including Cannon Street, Charing Cross, and London Bridge), and destinations to other parts of south-east

London (such as Sevenoaks and Orpington on the South Eastern Main Line). Operated by Southeastern, both Higher Green station and Lee station are in Travelcard Zone 3 and have a service frequency of between two to four trains per hour (Monday to Saturday).

Bus networks play a key role in terms of the public transport provision across the Neighbourhood Plan area (and wider London). The current bus network provides an important transport link for those people without access to a car.

London bus routes 202, 261 and 273 serve Lee Green station. Additional routes within the LNP area include the 335. The Forum would also like to see improved services between the LNP area and the following locations: Greenwich Peninsular, and Greenwich Town Centre.

Public Transport Accessibility Levels

Public Transport Accessibility Levels (PTAL) are a detailed and accurate measure of the accessibility of a point to the public transport network, considering walk access time and service availability. The method is Transport for London's way of measuring the density of the public transport network at any location within Greater London⁵⁷.

Each area is graded between 0 and 6b, where a score of 0 is very poor access to public transport, and 6b is excellent access to public transport.

In terms of connectivity to public transport options within the LNP area, the PTAL grades are between 2 and 3. This is shown in more detail in **Figure A8.1** below (taken from the Lewisham Characterisation Study), with the LNP area represented by the red line boundary.

⁵⁷ Transport for London (2021): 'PTALs', [online] available to access via [this link](#)

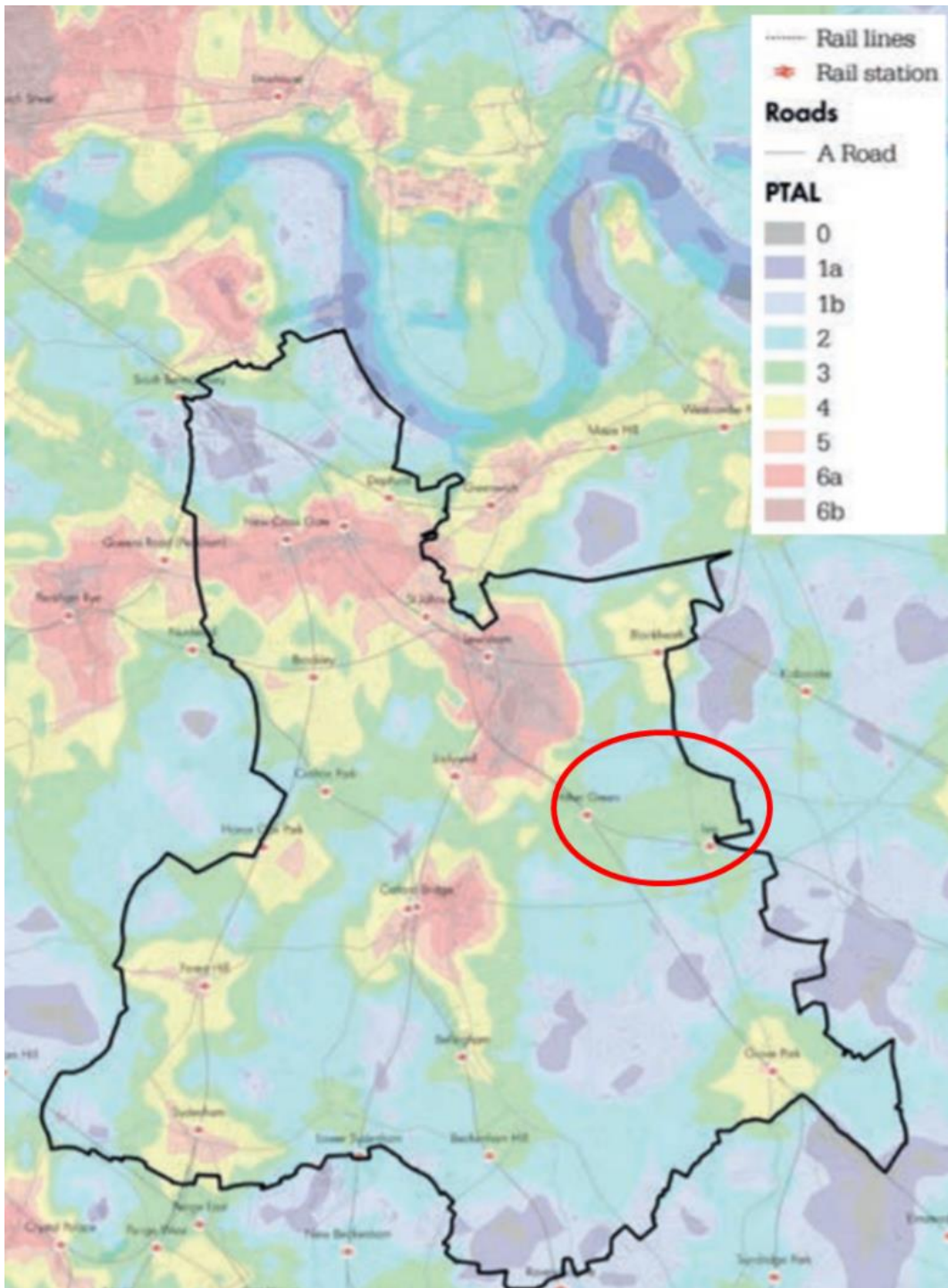


Figure A8.1: PTAL within the LNP area, and Lewisham Borough as a whole

Road network and congestion

Increased population levels and rapid economic and employment growth have led to an increased demand to travel that is impacting on the district's traffic levels on the approaches to the main urban centres. This has resulted in a higher rate of increase in traffic flows and there is now an emerging pattern of congestion on key corridors, with increasing delays and journey times and increasing seasonal congestion and peak period delays.

The LNP area experiences traffic congestion in the peak hours on all the main approach routes into Lee District Town Centre, including Lee High Road, Lee Road, Burnt Ash Road, Burnt Ash Hill, the A20, and the A205.

Lee Forum highlight commuter parking as a concern within the draft LNP, with those wanting to continue their onward journey by public transport into Central London leaving their vehicles within the LNP area. Additionally, vehicles used for drop-off and pick-up at many of the area's schools is a contributing factor to the lack of safety and air quality.

Public rights of way network

Department of Transport figures published in October 2020 show that between May and July 2020, 39% of people reported walking more and 38% reported cycling more than before the outbreak of the pandemic.

However, barriers to walking and cycling within the LNP area are associated with the lack of pedestrian crossings; noise and pollution levels along key routes into Lee District Town Centre; and road safety concerns associated with high levels of traffic.

In the context of the above, a key focus for Lee Forum is to facilitate the development of the River Quaggy Trail, which has support from the local community. This would include a continuous 'linear green chain' between Manor Park and Sutcliffe Park, linking the route of the River Quaggy (including those parts of the watercourse which are currently hidden from view and access) in order to celebrate and raise awareness of the natural river course, its wildlife and topography.

An additional focus for the Neighbourhood Plan involves the creation of a nature trail between the SNCIs within the area.

Future Baseline

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e. rush hours).

However, development within the Neighbourhood Plan area has the potential to lead to enhancements to the transport network to promote more sustainable modes of travel, such as the existing pedestrian and cycle network. Similarly, the provision of infrastructure to promote at home (i.e. remote) working is likely to positively contribute towards these aims.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

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